



POLICIES & PROCEDURES 2025

*Ofsted URNs for all clubs are available on our website
www.starfishkidsclub.co.uk*

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	CONTENT	38	Allegation Management
3	About these P&Ps; Play policy	39	Whistleblowing
4	Welcoming new parents, carers and children	40	Whistleblowing Continued
5	Equal Opportunities	41	Social Networking, Mobile Phone and Wearable Technology Policy
6	Access Policy	42	Staff Social Media Guide
7	Additional Needs	43	Medication Policy
8	Registration / Missing Child / Accidents	44	Drug, Alcohol and Smoking Policy
9	Breakfast Club – Arrivals, Departures & Missing Children	45	Drug, Alcohol and Smoking Policy Continued
10	Security Incident / Illness	46	Safer Recruitment Policy
11	Minimum Exclusion Periods for Infectious	47	Safer Recruitment Policy Continued
12	Illness and Diseases	48	Safer Recruitment Policy Continued
13	First Aid/Fire Risk / Fire Drill/ Evacuation Procedure	49	Staff Disciplinary Procedure
14	Food & Catering/ Food pre	50	Staff Disciplinary Procedure Continued
15	Healthy eating	51	Grievance Procedure
16	Art Activities/Store Cupboard/Risk Assessment	52	Capability Policy
17	Travelling to the Club / Late pick-up	53	Capability Policy Continued
18	Collecting Children	54	Staff Absence Policy
19	Late Collection / Babysitting	55	Staff Absence Policy Continued
20	EYFS	56	Absent Coordinator Policy
21	EYFS continued	57	Supervision Policy
22	Privacy	58	Supervision Policy Continued
23	Subject Access Requests (SARs)	59	Finance Policy
24	Child Centeredness	60	Payment and Notice Policy
25	Inappropriate Play	61	PCI DSS / Payment Records/Petty cash
26	Physical Intervention	62	Staff Wages/Volunteer Expenses / Payment to suppliers / Audit
27	Intimate Care	63	Complaints, Feedback and Grievance Procedure
28	Safe Touch	64	COVID-19 Policy continued
29	Behaviour Policy	65	COVID-19 Policy continued
30	Behaviour Policy continued	66	COVID-19 Policy continued
31	Anti-bullying	67	COVID-19 Policy continued
32	Anti-bullying continued	68	COVID Outbreak Procedure
33	Safeguarding and Child Protection	69	Key External Agencies, Services and Professionals' Contact Details
34	Safeguarding and Child Protection Continued		
35	Safeguarding and Child Protection Continued		
36	Child on child abuse, FGM & Extremism and Radicalisation		
37	Extremism and Radicalisation continued		

About these Policies and Procedures

These Policies and Procedures have been written to reflect the values, beliefs, and operating guidelines of Starfish Kids Club Limited (from here on known as "Starfish") and incorporate the Ofsted guidance and legislation relating to the voluntary and compulsory childcare registers as well as the EYFS as it relates to out of school provision. This document is updated annually and as required to reflect changes in legislation and guidance from OFSTED and the LSP. The document also incorporates guidance from the UN Convention on the Rights of the Child and refers to the Pan Sussex Child Protection and Safeguarding Procedures Manual

(<https://sussexchildprotection.procedures.org.uk/>) These Policies and Procedures provide statements and show outlines on each area of operation within the afterschool club and apply to all staff, volunteers, committee members, parents and carers.

If there is anything within these policies that you do not understand or would like clarifying then please raise the issue with the General Manager or a Committee member by calling 07941 525291, by emailing info@starfishkidsclub.co.uk or by writing to Werks, 15-17 Middle Street, Brighton BN1 1AL

PLAY POLICY

All children have the right to play (article 31 UN Convention on the Rights of the Child), and play is crucial for development, social skills, and general health. Playworkers at Starfish are trained to recognise the importance of play and seek to advocate play as an essential part of a child's life. Starfish seeks to provide a stimulating and challenging environment that maximises the choice and control that children have over their play. The club aims to offer play opportunities that promote all the different types of children's play and recognises the children's needs to test boundaries.

Starfish believe that in order to cater for each individual child's needs at each stage in their development it is important to provide the opportunity for reasonable risk-taking through play which can stimulate the children's imagination and facilitate learning and development. The Club aims to manage the balance between the need to offer risk and the need to keep children safe from harm.

Starfish acknowledges that through play a child may receive bumps and bruises and at times hurt themselves or others. This is a natural part of play and cannot and should not be eradicated from children's play. Accidents which happen during a session are always dealt with by trained first aiders. The accident and details of any injury are recorded on an accident report form along with recommendations for the future.

Accident report forms are reviewed and discussed regularly at staff meetings to identify any patterns or possible dangerous occurrences. Starfish aims to foster children's respect for others and promotes the development of independence and self-esteem through sensitive adult interactions and child centredness.

Welcoming New Children and Parents/carers

Information about Starfish can be accessed via the Family Information Service (FIS) and Brighton and Hove City Council on telephone number 01273 293545. Starfish's own website can be found at www.starfishkidsclub.co.uk and booking information is at starfishkidsclub.magicbooking.co.uk Parents/carers can contact the club by telephone, email, or letter. Following the initial inquiry, Parents/carers will be guided to the Magicbooking site to sign up and make a booking, as well as receiving a Parents and Carers Handbook. When a club is full on the day requested by a parent/carer, the General Manager will keep a waiting list which is usually operated on a first come first served basis (please see our Access Policy for exceptions to this arrangement). The coordinator will check through the completed information to ensure everything is in place to cater for any extra needs the child or family may have.

As soon as a place has been allocated to your child you will be welcome to accompany them to a session at the club, meet members of staff who will be caring for your child, and they can give you a clearer idea of how the sessions run, answering any questions you may have. It will give your child the chance to catch up with their friends who may already attend, join in or to just take a moment to observe and absorb what goes on. These taster sessions can reduce a child's anxiety, and indeed can increase their confidence and social skills, at the beginning of their time with us.

the child's first full session, a member of staff will be made responsible for showing them around the setting, where the toilets are and where the boundaries of play are. A child similar in age who is an established member of the group may be asked if they would like to make sure the new child is included in games and activities and made to feel a part of the group.

EQUAL OPPORTUNITIES

Starfish is committed to providing equality of opportunity for all adults, children, and families. Starfish believes that no child, individual or family should be excluded from the afterschool club due to any protected characteristics.

We aim to ensure that all who wish to work in or volunteer to help with our clubs have an equal chance to do so. In order to ascertain suitability for both Starfish as an employer and the person in question, applicants for both permanent and voluntary posts will be asked to complete an Enhanced DBS Check, a Health Declaration Form and provide two references (one of which must be from a previous employer) which will be checked upon condition of an offer to work. Proof of identity must be provided and will be copied and held on file. Starfish aims to practice equal opportunities in all areas of work and employment.

Starfish is committed to the principle that any behaviour, language, or action that creates discrimination or disadvantage is unacceptable and will be challenged. This statement echoes the Starfish aim that through sensitive adult interactions and child centredness, the club can foster the children's respect for others and promote the development of independence and self-esteem for all children.

Starfish will make every effort to ensure that the setting, equipment, toys, and books promote equality of opportunity for all and reflect the different cultures, levels of ability, family status, gender, religion, etc., of the children and their families who use our clubs.

Starfish is committed to the principles of The Children Act 1989 and to Children's Rights and will always promote this philosophy in our clubs. Thus, the welfare of the child is paramount, and we are committed to working in partnership with parents and other agencies to safeguard children. The children are regularly consulted and included in making decisions on matters which affect them such as the choice of food, activities provided, ground rules and resources purchased. In times of conflict over decisions between the staff and children, the staff will make every effort to explain and rationalise with the children to have a positive outcome.

Starfish will work closely with the schools that it provides care for to make sure that any children with English as a second language can access the club. This usually will take form as a meeting with the parents of the child and a school representative to see how the childcare needs can best be met. Extra support can be accessed by contacting EMAS (Ethnic Minority Achievement Service) at:

<https://www.brighton-hove.gov.uk/special-educational-needs-and-disabilities/ethnic-minority-achievement-service-emas>

Staff also receive training relevant to their role in the areas of Equality of Opportunity, Diversity and Additional Needs. Starfish policies take account of the Equality Act (2010) and the SEN Code of Practice.

ACCESS POLICY AND PROCEDURE

Starfish has a responsibility to have systems in place to ensure equality of access to all who wish to use the setting. Due to the Club's popularity Starfish has an ever-growing waiting list. Access to Starfish is usually by using the waiting list system. That is by contacting the Club and leaving a name and email address in order to be sent instructions of setting up an account on Magic Booking, our online booking system. Parents and carers will be sent the Starfish Kids Club Parents, Carers and Members Handbook. The waiting list is date ordered and usually operates on a first come first served basis. However due to our commitment to equal opportunities and anti-discriminatory practice, if a child or their family is considered to have priority circumstances then this may warrant them to be given a place without prior placement on the waiting list*. Starfish believes that no-one should be denied access to the Club under any circumstances and so will ensure that it operates under the proviso of equal opportunities, anti-discriminatory and anti-bias practices and make every effort to break down the barriers that prevent people from being included.

Starfish operates from a building which is fully accessible. The staff and children have had experience of working within an inclusive environment and meeting the various needs of the individuals therein. In the event of an unforeseen closure to the school which results in Starfish Kids Club sessions being cancelled at short notice; parents/carers will be notified immediately, so that they can arrange alternative childcare.

If the parent/carer cannot be contacted their emergency contact persons will be contacted. If an Outside source is responsible for the closure of Starfish Kids Club, the fee of the session/s will not be refunded. Starfish Kids Club has all the necessary contact details kept up to date with the Family Information Service (FIS) part of Brighton and Hove Council which advertises widely and promotes information and advice about childcare and children's activities.

*This decision will be made at the Committees discretion and if required with the input of relevant external agencies e.g. Social Services, Ofsted. The Club recognises that certain sections of the community may be more disadvantaged than others and that such steps may need to be taken to meet these needs. This does not compromise the Club's commitment to all areas of Equal Opportunity.

ADDITIONAL NEEDS

Starfish believes it is important to operate a provision which is fully inclusive and encourages anti-discriminatory practice for both children and adults. The Clubs operate from buildings which have full wheelchair access, and the settings and facilities are adaptable to enable the best level of care for all the children's needs.

A child who has a specific medical condition, developmental delay or other additional needs can be allocated a Starfish place after assessment and consultation with the parent/carer and any professionals involved with the child's care, should this be necessary.

If a child needs more care than the statutory staff ratios can provide, then an additional carer will be made available from the beginning of the child's attendance at the Club. Funding to cover the cost of such care will need to be sought before the child can be allocated a place. Once a one-to-one support worker has been recruited, they will be given a job description specifically tailored to the child they will be supporting. The job description specifically will be amended as and when necessary.

Funding is currently available from Brighton & Hove City Council under the auspices of the Childcare Inclusion Grant. The grant aims to meet the additional costs of including a child with special needs into a mainstream (Ofsted Registered) childcare scheme. This is under the provision that the child's Parents/carers can meet the costs of the standard fee rate. In the event of additional specialist equipment being required to enable the child to develop to their potential, the source must be identified, and the equipment needs to be acquired via the Childcare Inclusion Grant before the child starts attending.

At defined intervals the child's progress will need to be reviewed to ensure that the child is receiving the best possible care to meet their needs. Once a child who already attends Starfish is identified as possibly having additional needs the above policy will be implemented as soon as is considered practical. When required, staff will work alongside other professionals to reinforce therapies and procedures that have been devised to improve the child's development.

Starfish is aware that the needs of an individual child or family may change due to circumstances in their life and so will work with the child's parents/carers to provide the best possible care for each individual child. If a child, for example is having perceived behavioural problems then a strategy can be developed to support the child and family and every effort will be made to include the child at the Club. Each setting has a named SENCO. Please see the Named Persons documents on display at the clubs.

REGISTRATION COLLECTION PROCEDURE (Afterschool Clubs) –

- Prior to collection from class a Starfish Coordinator to check phone for messages regarding absent children.
- At the end of the school day (times vary by school), all children must be either collected from school or brought to the club by school staff.
KS1 children are either escorted directly to the club by school support staff (Cottesmore & St Pauls) or collected by a Starfish playworker (St Andrews).
KS2 children are expected to make their own way to the club independently, unless a specific arrangement has been made for collection.
- Register completed. Staff to sign against those children they have identified as being absent. Any children missing but registered at school will be searched for on the School grounds and absences checked at the office.
- If children are missing after initial search of the grounds, parents will be contacted.
- Once children arrive to the afterschool club, a member of staff to complete main register by 15:30.
- If no contact can be made with parent/carer of missing children and the child is still not located at 15:45pm, Coordinator to contact emergency services and report the child missing.

ABSENCES

- If a child is going to be absent from a session, parents must notify the Club in advance.
- If a child is absent without explanation, staff will contact the parents or carers and the school to check where the child should be. If staff still have concerns about the child's whereabouts after attempts to contact the parents and the school the manager will contact the police.
- The Club will try to discover the causes of prolonged and unexplained absences. Regular absences could indicate that a child or their family might need additional support.

MISSING CHILD

If a child is suspected of going missing after arriving at the Club, after having completed a thorough search of the grounds then the emergency services will be contacted.

The information which needs to be given to the Emergency Service is:

- name, address, phone number of the setting
- description of the child
- details about clothes, jewelry, etc. that they are wearing
- member of staff's details who is making the call
- where and when the child was last seen.

BREAKFAST CLUB – REGISTRATION, ARRIVAL & MISSING CHILD

Arrival and Registration Procedure

- Breakfast Club will run daily from **7:45am to 8:45am**.
- The last entry to the club is **8:30am**, when the school gates open to the wider school community.
- The school gates will remain closed throughout the Breakfast Club session, and staff will manage entry as children arrive.
- Parents and carers must bring their child to the school gates and call the club phone number upon arrival. A member of Starfish staff will meet them at the gate to let the child in.
- For children walking to school on their own, a signed consent form must be completed by parents/carers in advance. In these cases, parents will receive a text message confirming their child has arrived safely.

Non-Attendance Procedure

- A register will be completed as children arrive at the club.
- If a child is booked in but has not arrived by **8:30am**, staff will attempt to contact the parents or carers to confirm the child's whereabouts.
- If parents cannot be reached and the child has not been accounted for, staff will follow the **Missing Child Procedure** below.
- Any absence from Breakfast Club will be shared with the school office to ensure all safeguarding protocols are followed.
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Missing Child Procedure

If a child is suspected to be missing, or has not arrived by 8:30am and cannot be located after following the above steps:

1. Starfish staff will:
 - Check phone messages and any communications from parents.
 - Check with the school office to confirm the child's attendance and any known absences.
 - Contact parents or carers immediately to establish the child's whereabouts.
2. If parents/carers cannot be reached, and the child is still unaccounted for:
 - A thorough check of the school grounds will be conducted by staff.
 - If the child remains missing, the Coordinator will contact emergency services by **8:45am**.

The following information will be provided to emergency services:

- The setting's name, address, and phone number
- The child's full name and description, including clothing and any distinguishing features
- The time and location the child was last seen
- The name and details of the staff member making the report

Children Missing After Arrival:

If a child is believed to have gone missing after arriving at Breakfast Club, the same procedure applies, with a thorough search of the setting and immediate notification to emergency services if the child is not found.

ACCIDENTS

Approach the situation calmly but with speed and take control until the named first aider arrives. The designated First Aider has a current first aid certificate and has attended a 12-hour paediatric first aid course which complies with the requirements of Annex A of the EYFS. First aid training will be renewed every three years. Staff will reassure the child/children and be aware they may be in shock. Staff will assess the situation and decide what action to take, e.g., first aid, help from bystanders, call for assistance, emergency services. Explain and reassure non-injured children to avoid panic and maintain a calm atmosphere. This may be achieved by moving the other children (if safe to do so) away from the situation to a safe place to reassure them.

If medical treatment is required, then someone will call the emergency services giving details of the condition of the injury and child involved. The child's Parent/carer will be called. Staff will obtain a copy of the child's Registration Form with information of any medical conditions or allergies to give to the emergency services.

A member of staff will accompany the child to the hospital if the parent/carer is not available. As with all accidents record details on an accident form, the coordinator will be notified and ensure that the parent/carer reads and signs it. The accident forms will be reviewed at the Staff Meetings. Staff will report the accident to appropriate people e.g., Committee members, and if appropriate to the Health and Safety Executive with Form F2580 (Report of injury or dangerous occurrence). Ofsted should also be notified of any serious injury within 14 days.

SECURITY INCIDENT

In the event of a breach of security then assess the situation and inform the emergency services. The information which needs to be given to the Emergency Service is:

- the nature of the incident
- what service is required
- location of the incident
- whether there are any injuries
- whether or not you require an ambulance
- description of the people involved.

ILLNESS

If a child has been absent from school due to illness they will not be accepted at the club until well enough to attend school again.

If a child becomes unwell at the setting a playworker will reassure and comfort the child making sure there is somewhere to rest and assess how serious the condition is. Other children will be kept away and a playworker will monitor the child. The child's parent/carer or emergency contact will be contacted and asked to make arrangements for early collection.

If a child is suspected of having a contagious illness they will be separated from the rest of the children and a playworker will stay with them. The child's parent/carer or emergency contact will be contacted immediately and asked to make speedy arrangements to collect their child to reduce the chance of other children being infected.

If a child who has attended the club is diagnosed with an infectious disease by a qualified medical person, then Ofsted will be notified, and their recommendations will be followed. A full report will be made on an Accident Form and signed off by the Parent/carer and advice will be taken from a Consultant in Communicable Diseases or in the case of food-borne outbreaks from the Environmental Health Officer. In both cases the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR) will be completed. It may also be necessary to contact the local health protection team (Surrey and Sussex) on 0344 225 3861 to make a report or to receive advice.

MINIMUM EXCLUSION PERIODS FOR INFECTIOUS CONDITIONS AND wi

Disease/Condition	Exclusion Period
Chicken Pox	Until all vesicles (spots) have crusted over
Cold Sores	None. Avoid contact with sores.
Conjunctivitis	None
Coronavirus (COVID-19)	Follow government guidance on testing and household isolation
Diphtheria*	Exclusion always necessary, consult local Health Protection Team
Diarrhoea and Vomiting	48 hours after last episode of diarrhoea or vomiting
Glandular Fever	None
Gastro-enteritis, E. Coli, Food Poisoning, Salmonella and Dysentery	48 hours after last episode of diarrhoea – further exclusion may be required for some children
Hand, Foot and Mouth disease	None
Hepatitis A*	Until 7 days after onset of jaundice
Hepatitis B* and C*	None
High temperature	24 hours
HIV / AIDS	None
Impetigo	Until lesions are crusted and healed, or 48 hours after starting antibiotic treatment
Influenza	Until recovered
Measles*	4 days from onset of rash
Meningitis*	Until recovered
Molluscum Contagiosum	None
Mumps*	5 days from onset of swollen glands
Pediculosis (lice)	None
Pertussis* (Whooping cough)	5 days from commencing antibiotic treatment or 21 days from the onset if antibiotics not given
Ringworm	Exclusion not usually required
Rubella* (German Measles)	4 days from onset of rash
Scabies	Until first treatment has been given
Scarlet fever*	24 hours after starting antibiotic treatment
Slapped Check, Fifth Disease	None (once rash has developed)
Threadworms	None
Tonsillitis	None
Tuberculosis*	Consult local Health Protection Team
Typhoid*, Paratyphoid*	48 hours after last episode of diarrhoea – further exclusion may be required for some children
Warts (including Verruca)	None. Verruca sufferers should keep feet covered

* Denotes a notifiable disease, i.e. It is a statutory requirement that doctors report a notifiable disease to the appropriate authorities.

If in any doubt, contact the local health protection team (Surrey and Sussex) on 0344 225 3861 to make a report or to receive advice

FIRST AID

- 2 members of staff to have current first aid cert onsite at all times
- The Club has multiple first aid boxes including travel kits for pick-ups and trips
- Large box is situated in the store cupboard and kept on site at all times
- Small boxes/bags to be used for outings and separate bag for medicines
- Medication form must be signed by parent/carer and signed on each administration of medicine by member of staff
- Staff Medication to be stored away from children and in our locked cupboard
- Both boxes to be checked regularly by Deputy to ensure they remain fully stocked and in date
- Staff must wash hands thoroughly before administering First Aid
- Gloves must be worn by staff when dealing with bodily fluids, e.g. blood, vomit, etc.
- No medicines to be administered unless requested and authorised by the Parent/carer. A letter of authorisation including dosage details will need to be supplied by the Parent/carer.
- All accidents must be recorded in full on an Accident Form and the coordinator informed and the form signed by the child's Parent/carer.
- In case of hospital treatment being necessary the child will be kept comfortable and reassured. An ambulance will be called, and the Parent/carer/Emergency Contact will be notified immediately. A member of staff will accompany the child to hospital in the absence of the Parent/carer or Emergency Contact and take with them the child's Registration Form.

FIRE RISK

- Kitchen appliances are to be used by staff only and never left unaccompanied when in use and always placed safely away when finished.
- Keep water away from plug sockets and electrical appliances.
- Switch off and unplug appliances after use.
- In case of fire, use fire appliances only where appropriate and to extinguish small fires only.
- Fire appliances are checked by the school.
- Fire drills are carried out at least once per term and recorded in the completed forms folder (stored in file cupboard).

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FIRE DRILL

- Sound the alarm at the nearest point or simulate alarm.
- Staff to lead children quickly and quietly to the nearest and safest fire exit.
- Do not attempt to collect any belongings, shoes, coats etc.
- Two members of staff (this should be the fire officers) will check toilets and all other areas for children before leaving the building.
- Coordinator to gather if safe to do so- Registers, Registration forms, visitors' book and staff sign in

EVACUATION/LOCK DOWN PROCEDURE

See evacuation & lockdown procedures on display and risk assessment on site at each club.

FOOD SAFETY

Starfish Kids Club is committed to ensuring that safe and healthy practices around the storage, preparation and service of food are followed at all times. Staff involved in food handling and preparation must meet high standards of personal hygiene. Any member of staff showing signs of infection or ill health will not be permitted to handle food.

Starfish Kids Club follows the guidelines set out in 'Safer Food, Better Business' (FSA) and is registered as a food business with our local authority. We are regularly inspected by Environmental Health to ensure that health & hygiene standards are being met.

All staff involved in food handling have received food handling and hygiene training. When preparing food, staff follow the requirements of current food hygiene legislation, including;

- Always washing hands with anti-bacterial soap and hot water before and after handling food and using the toilet
- Staff wear aprons and tie hair back
- Using clean, disposable cloths
- Using the correct colour coded chopping boards (e.g. green for fruit and vegetables)
- Not being involved in food preparation if they are unwell
- Making sure all fruit & vegetables are washed before being served
- Removing jewelry, especially rings, watches and bracelets before preparing food
- Covering spots or sores on the hands and arms with a waterproof dressing
- Keeping fingernails short, clean and free from varnish

FOOD STORAGE

All foods are stored according to safe food handling practices and at a correct temperature, to prevent the growth of food poisoning organisms and to ensure that food quality is maintained.

Fridge temperatures are checked and recorded on a daily basis as part of our daily environment checks. If there are temperature fluctuations that are not explained by simple user errors (eg failure to shut fridge properly), a new fridge will be purchased.

CLEANING

- The fridge is cleaned thoroughly, with warm, soapy water, on a weekly basis
- Food is checked for freshness – anything past the use by date will be disposed of
- Freezers are defrosted and cleaned once a month
- All preparation surfaces are wiped clean before and after use with anti-bacterial cleaner and disposable cloths
- All chopping boards cleaned after use with warm soapy water, antibacterial cleaner and then thoroughly rinsed
- Appropriate controls are implemented to reduce the risk of cross contamination
- Cutlery, plates, cups, etc., to be cleaned in hot soapy water after use by staff

FOOD PREPATION & SNACK

- A member of staff must always be present when cooking and heating food is in progress
- Children will not be allowed into the kitchen without a member of staff present and this is always in accordance with our food preparation risk assessment
- Sharp knives to be stored safely away from the children
- All snacks and cookery sessions contain only Vegetarian ingredients and nut products are avoided.
- An up-to-date list of children's dietary requirements and allergies to be on display in the food storage cupboard and at the front of the registration file.
- Children to be consulted regularly regarding choice of snacks.
- Food from other cultures to be included in the snacks offered

HEALTHY EATING

Starfish aims to provide a tasty, healthy, and varied menu of snacks and drinks for children attending after school club or play schemes, considering any special dietary needs or allergies.

- Parents must inform Starfish of any special dietary needs or any allergies that their child may suffer from on the registration form.
- The special dietary needs list should be kept in a place known to all staff and should be checked before any food preparation or cooking activities take place.
- When preparing food and drink, play workers will follow the guidelines in our Food Preparation policy.
- Starfish will aim to ensure that our snacks menu and cooking activities offer a varied and mainly healthy range of food. We will offer fruit / vegetables on a daily basis.
- Water will be available for children to drink throughout the session.
- Children will be asked for their feedback on snacks and drinks offered. Wherever possible children's ideas and suggestions are included in the planning of future menus.
- Due to nut allergies, no nuts or nut-based products should be brought into the setting

ART ACTIVITIES

- Art equipment and materials to be stored away safely in the store cupboard.
- Craft knives and sharp scissors to be used by staff only and put away in the adult toolbox immediately after use.
- Adult toolbox to be kept on a high shelf in the store cupboard or in the locked staff cupboard, out of reach of children.
- Only child safe glues and paints to be used by the children.
- Aprons/old T shirts to be worn to protect children's clothes when doing messy activities.
- At least one member of staff to supervise art table at all times (in accordance with staffing ratios)
- Keep art table and surrounding floor space uncluttered and free from spillages.
- All areas to be cleaned after use and tables wiped down with antibacterial spray.

STORE CUPBOARDS

- Children will not be allowed to enter unless accompanied by an adult.
- Cleaning products to be stored out of children's reach.
- Sharp knives, scissors, and other potentially dangerous equipment to be stored in the adult toolbox, kept on a high shelf out of reach of the children or in the locked staff cupboard.
- All materials and equipment to be stored in relevant boxes and put away tidily and safely after use.
- TV, video, and other electrical equipment to be locked away when not in use.
- Electrical equipment tested once a year.
- File cabinet containing children's and staff's personal details to remain locked at all times.
- Accident, incident, and message books to be accessible in the staff cupboard.

RISK ASSESSMENTS

- Risk assessments will be carried out for individual activities and resources in advance and stored on site for staff to refer to. Risk assessments are reviewed annually.
- Staff are also trained to perform risk assessments as they are required during the session in the form of visual and physical checks of the space, equipment, and spontaneous activities.
- Staff will complete a daily environment check form which includes inspection of all equipment and premises (indoor and out) before the children arrive. Daily risk assessment forms are reviewed regularly to ensure repairs are implemented where necessary and common hazards are dealt with.

All staff are asked to read, understand and sign off risk assessments during induction. These include assessments on the different areas of each club such as main halls, community rooms, outside areas, no-go areas, and storage.

TRAVELLING TO THE CLUB

The Club and schools have a clear agreement concerning the transfer of responsibility for children's safety. Clubs situated on-site at the host schools, KS1 children are brought to the club by the teachers/support staff. KS2 children make their own way to the club

St Andrews:

- We have risk assessed the route used to escort children to the Club and review it regularly.
- Playworkers will carry a travel First Aid Kit, register and the children's details in case of an emergency.
- At least two playworkers (according to ratios) to collect children from St Andrews at 15:15pm,
- The Register is taken by a playworker as the children meet at the collection point. Check with staff in school office for any unaccounted-for children. A thorough search of the school grounds will be performed before contacting parents at 4:00pm if child's whereabouts is not attained coordinator to report child to emergency services as missing.
- Children should walk back to the setting in an orderly fashion, preferably in pairs.
- Staff will ensure a good standard of behaviour while walking and discourage children from playing with their belongings. Running, cycling, or scootering is not acceptable.
- Whilst walking back to the setting, there should be playworkers at either end of the line, a playworker should be in the middle of the line.
- At any time, the whole group is not paying attention, the journey should be suspended, until the playworkers are happy that all children are once again paying attention.
- Children who run across the road, or ignore instructions, should be taken aside once on arrival at the setting and discuss roadside safety with the coordinator or deputy.
- The staff/child ratio whilst off site is 1:6 for children under 8 years of age.
- All playworkers should take equal responsibility for everyone's safety during the journey to the setting.
- If it is necessary to cross a road, the lead playworker will ask the children to stop at the kerbside and wait there until it is safe to cross. At the kerbside the two playworkers at either end should check then stand in the middle of the road and ensure that the road is clear and safe of traffic and encourage the children to walk across the road in between the two play workers.

Road safety to be discussed at regular Ground Rules activities/Kids' Council Meetings.

LATE PICK-UP FROM SCHOOL CLUBS

Starfish also offers a pick-up service, where possible according to adult:child ratios, for children attending afterschool clubs on-site at the schools we work with. This allows an opportunity for children to attend extracurricular activities which are great for social development and further learning.

This pick-up involves a member of staff (with first aid training and enhanced DBS) leaving the main setting with travel first aid kit, ID, phone for emergencies and appropriate individual medication. For these pickups we work to a 1:6 adult:child ratio for extra safety. These pick-ups must be arranged in advance by parents so that staffing can be arranged appropriately. The route is the same one used for the after school pick up and has been risk assessed.

COLLECTING CHILDREN FROM THE CLUB

- Parents/carers may collect children from 15.25 onwards.
- Parents/carers need to ring the doorbell and a member of staff will unlock the door for them to gain access.
- Children may only be collected by people identified on the child details submitted by the parent/carer. If another unnamed adult is to collect a child, then express permission from the Parent/carer is required prior to collection. This will preferably be in the form of a text or email but can be confirmed over the phone.
- Before a Parent/carer leaves the site with their child(ren) they must sign the child(ren) out on the register and record the departure time.
- Staff will welcome Parents/carers on arrival at the Club and ensure the digital register has been signed and departure time recorded. If a Parent/carer has forgotten to sign out, then the playworker must do so for them. This will only occur if a playworker has observed the child leaving with a parent or carer. Parents are regularly reminded to sign their children out.
- Staff will ensure the door is locked after a Parent/carer has arrived or departed.
- Children over the age of eight will only be allowed to leave the Club alone at the end of the session if the Club has discussed this with the child's parents and has received their written consent.
- Children below the age of eight will not be allowed to leave the Club unaccompanied.

Starfish afterschool club sessions finish at 18:00 and holiday clubs at 17:30 and the children must be picked up promptly at or before this time. Children will only be allowed to leave with a parent/carer, or any other adult named on the collector's list on their Magic Booking account, unless the club holds written permission from the parent/carer to allow the child to leave with someone else who should provide identification upon request.

All children must be signed out by the parent/carer/authorised collector and the time of departure recorded prior to leaving the setting as per the above guidelines.

If a Parent/carer is going to be late collecting their child, they must inform the club before 18:00. Two members of staff will remain at the setting with the child until collection by a named parent/carer. Starfish charges for late collection as below:

On the second late collection within a term, without reasonable excuse, the parent / carer will be charged £10.00 per child every 15 minutes (or part thereof) after the booked session has ended. This charge is to meet the additional staff costs in order to care for a child after hours. Repeat offending may result in suspension of the child's place at Starfish.

LATE COLLECTION OF CHILDREN

The procedure below is designed to provide playworkers and parents/carers with clear guidelines in the event of un-notified late collection:

1. If no one has arrived to collect a child or contacted the club by 18:15 the emergency contacts will be called.
2. If we have not been able to contact anyone, at 18:30 the Children's services Emergency Duty Service (operating from 5pm Mon – Thu and from 4.30pm Friday) will be advised of the potential collection problem on 01273 335905/6. This team will offer advice on how to proceed.
3. If no contact has been made by 19.00, staff should call 101 (Police) to report and take advice. Local police may have to attend the facility to effect police protection and will liaise with EDS to take responsibility for the child. One member of staff will retain the Starfish mobile phone and provide the number to the police and social services in case a parent/carer contacts them.

BABYSITTING POLICY

Starfish staff may babysit for parents outside of the workplace; however, this must not affect their job role in the setting and all responsibility for any events that happen outside of the setting will not reflect the standard of childcare at Starfish. If any staff choose to babysit then this is a contract between the parents and themselves. All extra care should not involve Starfish Kids Club and the responsibility lies with the individuals concerned and not the club

EYFS (Early Years Foundation Stage)

The Early Years Foundation Stage (EYFS) is administered by Ofsted, and it requires all childcare settings providing care for children up until the end of the school term in which they turn 5 years old. These policies comply with the latest Statutory Framework for the EYFS, set out by Ofsted.

All Starfish staff have a working knowledge of EYFS. Starfish parents/carers are made aware of EYFS intentions and records and have access to them.

EYFS Procedure

All children attending Starfish Kids Club who are in reception are appointed a keyworker from one of our staff team. The child and their parent/carer will be introduced to this keyworker.

The child is not solely monitored by their keyworker, and children are discussed at staff meetings to ensure knowledge of children is shared. Each child is observed regularly, and a weekly 'diary' entry is completed for each child, sometimes with the child. EYFS children are discussed weekly at staff meetings, and EYFS-friendly activities are included in the monthly activity rota during the rota planning.

Summaries of our observations at club will be shared with the child's main EYFS provider, this is usually the child's school or social services if necessary (re; child protection policy). Starfish will work in partnership with these agencies if necessary to ensure a child's wellbeing. Starfish informs parents of EYFS through face-to-face conversation and email updates. Starfish will securely archive records in the office which will be retained and destroyed according to the Early Years Retention Periods document attached.

EYFS Staff Procedure

All Staff are expected to be aware of all EYFS children in their care. We will provide an induction for all staff, in order to brief them about the setting our policies and procedures and our EYFS practice.

Coordinator

- To oversee EYFS system within setting.
- To update EYFS register and keyworker list.
- To partner keyworkers with children.
- To bring EYFS records to meeting agenda.
- To bring termly assessments to General Manager so that these may be shared with the relevant agencies.
- To communicate changes in EYFS system, regulations, and peripheral information about EYFS children to playworkers.

Deputy

- To ensure an observation is undertaken regularly
- To be aware of EYFS children within setting and manage playworkers to complete observation form where applicable.

Playworkers

- Keyworkers are expected to complete observations/diary entries regularly of their allocated child.
- All playworkers are expected to complete an observation if they witness any activity involving several EYFS children.
- All playworkers are expected to complete an observation if they witness something pertinent from any EYFS child.
- All playworkers are expected to show vigilance in recording observations and assessments and complete them under their own initiative. To be aware of contents of EYFS file and our confidentiality policy and procedure.
- To communicate any concerns to coordinator or deputy.
- To attend weekly staff meetings and to participate in planning and delivering appropriate activities and games

PRIVACY

Starfish kids club respects the privacy of children and their parents and carers. We aim to ensure that parent/carers can share their information in confidence.

There are record keeping systems in place that meet legal requirements; means of storing and sharing that information take place within the framework of the GDPR, the Human Rights Act and PCI DSS. For more detailed information on our security policy and particularly that related to card payment information, please see the Information Security Policy document which is available on our website or to view on site at the club.

Privacy Notice

At Starfish Kids Club we respect the privacy of the children attending the Club, the privacy of their parents/carers and the privacy of our staff. The personal information that we collect is used only to provide appropriate care for children, maintain our service to parents, fulfil our legal employment and childcare requirements and communicate effectively.

Any personal information that is held by Starfish is kept secure and shared on a need-to-know basis. Data that we hold on children and parents is erased once the child has left the club; data that we hold on staff is retained and destroyed according to the Early Years Retention Periods document attached.

We will contact parents and staff members by phone and email. Parents, carers, and staff may receive updates on social media if they sign up for this themselves. To parents and carers, we send information about your child, our Club and other relevant news, including communication regarding payment of fees. It is very important that we have a phone and an email address in order for us to contact you about important club information.

We will only share personal information about you or your child with another organisation if we:

- have a safeguarding concern about you or your child
- are required to by government bodies or law enforcement agencies
- engage a supplier to process data on our behalf (e.g., Magicbooking)
- have obtained your prior permission.

You have the right to ask to see the data that we have about yourself or your child, and to ask for any errors to be corrected. We will respond to all such requests within one month. You can also ask for the data to be deleted, but note that:

- if you are a parent or carer, we will not be able to continue to care for your child if we do not have sufficient information about them
- even after your child has left our care, we have a statutory duty to retain some types of data for specific periods of time (according to the Retention Periods document attached) so can't delete everything immediately.
- If you are a member of staff, there are some pieces of information that we need to retain as part of our employer responsibilities and to fulfil things like payroll.

If you have a complaint about how we have kept your information secure, or how we have responded to a request to access, update or erase your data, you can refer us to the Information Commissioner's Office (ICO).

Subject Access Requests

To request a copy of the personal data that we hold about you (aka Subject Access Request or SAR), please send your SAR, or any requests to rectify, erase, restrict or object to the data we hold in writing to:

The Data Protection Officer Starfish Kids Club
Werks, 15-17 Middle Street, Brighton BN1 1AL

Or via email to info@starfishkidsclub.co.uk

We will respond within one month of receiving your request.

CHILD CENTREDNESS

- The setting should be set up in time before the children arrive at the club.
- The children will be warmly welcomed on arrival and reminded of placing coats and bags in the allocated place.
- The Coordinator or Deputy will complete the Register by 16.00 and account for any absences either with the school office or by phoning a Parent/Carer.
- Children will be encouraged to take part in the activities of the group. However, the staff are aware that children may need to be given space to play without adult intervention and this will be respected unless the children's safety is at risk or if a child is perceived as being troubled or involved in overly aggressive behaviour.
- A quiet area will be set up in the hall as children sometimes enjoy sitting alone, thinking or reading. This should not be a cause for concern unless the child is persistently rejecting interaction with other children or the staff. If this is the case, then a playworker will gently try to ascertain the reasons behind the child's choices to be alone.
- A child's Parent/carer should be approached in private by the coordinator if the staff become concerned in any way about a young person's welfare. Welfare concerns should be recorded in the incident book and signed by the member of staff involved. Refer to the Child Protection policy if further action is necessary and speak to the coordinator or a member of the Management Committee about any issues concerning a child's welfare.
- A suggestion box will be on display regularly and the children will be encouraged to write down or talk about any suggestions for the club that they have. Likewise, Parents/carers will be encouraged to offer suggestions and ideas. Every effort will be taken to incorporate children's and parent/carer's ideas and suggestions.
- Through staff planning sessions, children will be offered exciting and stimulating activities and projects.
- All the work produced by the children will be praised and treasured. Children will be encouraged to offer their work to be displayed on the notice board or to take home when complete.
- The children are encouraged with staff consultation and involvement to produce their own Ground Rules for behaviour whilst at the Club. The rules will apply to everyone, adults, and children alike.

INAPPROPRIATE PLAY POLICY

Playworkers should be aware of play which deals with topics which are not age appropriate and should challenge anything that they feel is not suitable and intervene where necessary. This could include topics such as:

- Drug use or alcoholism
- Violent situations e.g., domestic violence, racially motivated or homophobic attacks and other violent crimes.
- Sexual acts
- 18 certificate films and games

If a child or group of children are playing in a way which is considered inappropriate or expressing any of the subjects listed above, workers should approach the child/ group of children and suggest more positive ideas to include in their game or assume a role in the game themselves.

Workers should encourage the children to consider how they might feel in the different roles and explore possible responses to the situations portrayed in the game. The game could be used to look at ways for children to protect themselves and others and how to recognise signs of feeling unsafe.

Workers must be aware the children they work with may witness these situations in their real life.

If a child or group of children are pretending to have sex, workers should explain it is not appropriate to do this at the club and assume a role in the game to change the focus of the game.

If a worker is concerned by the graphic nature of the sexual act, they should take the child away from the group and explain to the child it is not appropriate to pretend to have sex at the club as other children may not be as knowledgeable. Workers should stress play of this kind is not permitted at Starfish but be aware that in other situations such as play therapy, the child may be encouraged to engage in this kind of role-play. It is important not to say sex is 'wrong' or a person who has sex is 'bad', as this may have a damaging effect on a child who has suffered from sexual abuse.

ANY CONCERNS MUST BE RECORDED ON AN INCIDENT FORM AS SOON AS POSSIBLE AND DISCUSSED AT THE STAFF MEETING OR END-OF-DAY DEBRIEF. IF THIS IS A SAFEGUARDING ISSUE THE PROCEDURES FOR SAFEGUARDING CHILDREN SHOULD BE IMPLEMENTED

PHYSICAL INTERVENTIONS POLICY

The term 'physical intervention' is used to describe any use of physical contact which aims to keep the child or others safe. This may include holding a child's hand, placing you between the child and source of danger, touching a child to calm them or restraining a child.

The Children Act 1989 and associated government guidance states physical restraint can be used where a child is presenting an immediate risk of serious harm to themselves or others, or of damage to property, and where no other intervention is likely to be effective. Physical restraint/ restrictive measures must only be used in these circumstances and when there is no alternative.

- The child's welfare must be paramount.
- Workers must prevent any injury to the child or themselves.
- Only use physical interventions which you have been trained to use and you feel comfortable using.
- Use the minimum force necessary.
- Any interventions should be employed for the shortest time necessary.
- Remember physical interventions may be particularly threatening, frightening or bewildering for the children.
- Be considerate about cultural or religious views about touching and issues of gender
- Remember not all children seek physical comfort when they are distressed
- Let the child know what you are doing and why.
- If a child shows any signs of physical distress, workers must let go immediately.
- Restrictive measures must not be used as punishment.
- Holding must not be used as a method of ensuring compliance with instructions.
- Complete an incident report for all instances of physical intervention.
- The use of physical interventions should be regularly reviewed and reassessed.
- If a particular child requires intervention on a regular basis, an agreed procedure must be drawn up with the child's parent/carer.

INTIMATE CARE POLICY

When providing intimate care, we will ensure that the child's safety, dignity, and privacy are always maintained. 'Intimate care' covers any task that involves washing, touching, or carrying out a procedure to intimate personal areas and is associated with bodily functions and personal hygiene, including toileting, washing, and dressing. Staff at Starfish Kids Club who provide intimate care will do so in a professional manner. Children should be given a choice of who will be delivering the intimate care and this should always aim to be delivered by the same gender. Staff are aware of safeguarding issues and will have relevant training (e.g., health and safety, child protection, manual handling) before providing intimate care. No child should suffer distress or pain as a result of receiving intimate care.

Staff will work in partnership with parents or carers to provide care appropriate to the needs of the individual child and together will produce a care plan. The care plan will set out:

- . What care is required
- . Number of staff needed to carry out the task (if more than one person is required, reasons will be documented)
- . Additional equipment required
- . Child's preferred means of communication (e.g., verbal, visual)
- . Child's level of ability – what tasks they can carry out by themselves

Best practice

Children should be given a choice of who will be delivering the intimate care and this should always aim to be delivered by the same gender. When intimate care is given, the member of staff will explain to the child each task that is carried out, and the reasons for it. Staff will encourage children to do as much for themselves as they can. If a child requires intimate care on a regular basis, it is good practice for two members of staff to share the care between them. In this way the child is less likely to become overly dependent on a single member of staff, and to become distressed if their usual carer is occasionally unavailable.

However, parents' views on the number of staff providing personal care to their child must also be taken into consideration - some children may simply be unable to cope with more than one carer. We have policies in place that promote safe recruitment, as well as having sound staff supervision, safeguarding and intimate care procedures; together these ensure that, should a child need consistent care from one member of staff, the child's safety and well-being will not be compromised.

Protecting children

Staff are familiar with guidance from the local Safeguarding Partnership (formerly the LSCB). The Club's procedures reflect the guidance in *Working Together to Safeguard Children (2023)* and staff are familiar with the *What To Do If You're Worried A Child Is Being Abused (2015)* flowchart from this guidance.

If a member of staff is concerned about any physical changes to a child, such as marks, bruises, soreness etc, they will inform the manager or the Club's designated child protection officer immediately. The procedures set out in the **Safeguarding Children** policy will be implemented.

Should a child become unhappy about being cared for by a particular member of staff, the manager will investigate and record any findings. These will be discussed with the child's parents or carers in order to resolve the issue. If necessary, the manager will seek advice from outside agencies.

If a child makes an allegation against a member of staff, the procedure set out in the **Safeguarding Children** policy will be followed.

SAFE TOUCH POLICY

Workers have a responsibility to maintain and model appropriate boundaries. It should be recognised that children who have experienced or witnessed physical or sexual abuse may be confused about appropriate physical touch and boundaries.

- Workers should not initiate physical contact but if it is given ensure that it ceases at the earliest possible moment without causing the child to feel rejection.
- Workers should avoid physical expressions of affection such as kissing or hugging, or intrusive forms of play such as tickling or 'roughhousing'.
- If a child persists in wanting a kiss or hug, or questions the workers reaction, it should be explained that workers should not kiss/hug people they work for or with.
- None of this should stop the occasional close physical contact e.g., when children are sitting close up to have a story read or are playing games that involve some physical contact.
- When there are clear and specific reasons for doing so workers may initiate physical contact e.g., if a child is distressed or injured.
- If lifting or restraining a child is unavoidable, workers should avoid intimate contact in terms of where on the body contact is made.

BEHAVIOUR

Starfish acknowledges that children's behaviour is influenced by their experiences in and out of the play setting and influences at home and school all contribute. Children will respond to influences in different ways depending on their physical size, confidence, self-esteem, and life experiences. Starfish believes that building good relationships with children depends upon acknowledging, encouraging and reinforcing positive behaviour and being consistent in discouraging unwanted behaviour.

By compiling behaviour guidelines or 'Ground Rules' with the children and with staff consultation and involvement, we aim to have set boundaries which help the children develop a sense of significance for their own behaviour on both the physical environment and those around them.

Starfish understands that dealing with unwanted behaviour is important because it can be unsafe for the child concerned and for those around and that by ignoring unwanted behaviour, children will not get the best out of the play setting

Ways of challenging and dealing with unwanted behaviour:

- Be aware of possible trouble and try to resolve before a conflict occurs - Ground rules – referred to when failure to comply
- Ignoring the behaviour – when behaviour is an attempt to get attention distraction – a change in activities can be an effective way of changing moods
- Intervening – when behaviour is bullying or discriminatory and explains why abusive behaviour is unacceptable
- Talking with Parents/carers – for behaviour which is persistent and where other methods are not working, to compile a longer-term strategy supported by the parent/carer
- Discussing and negotiating – for older children this may be a more effective way to resolve conflicts.

Starfish staff recognise that bullying can be physical, verbal, or emotional and as such are alert to the instances of bullying and the children are encouraged to report such incidents. See Anti-Bullying Policy.

In cases where a child is not responding to any of the above methods then a formal meeting will be arranged with the child's Parent/carer to discuss the issues and a possible route forward. An observation system may be introduced with the child's and Parent/carer's permission whereby staff observe the interactions and behaviours of the child, both positive and negative and write these down on observation sheets. This system can be used to help find out any triggers and find useful strategies to cope with any problems the child may have. This system of observation can be used to ensure that the child can continue attending the Club and not be excluded. In very extreme situations where a child's behaviour is seriously affecting the life of the rest of the group then a parent/carer will be asked not to bring their child to the club for an agreed period, to give both the child and the Club time to reflect.

Procedures for Challenging Behaviour:

LEVEL ONE: MINOR INCIDENTS

For example: name calling, going out of bounds, and disrespect for equipment, materials, property or stealing. Playworker informs child that their behaviour has been inappropriate, tries to establish why the incident occurred and discusses with them how the situation can be resolved, this is a first warning, if the behaviour continues the child will be put on 'time out' for 5 minutes. This gives time for reflection and the adult can discuss the behaviour with the child after the time out. Child makes amends if appropriate. Matter is discussed with parent/carer and at the end of session with the rest of the staff team.

LEVEL TWO: MINOR INCIDENTS – REPORTED

For example: name calling, going out of bounds, not respecting materials/equipment, and stealing. Matters have been dealt with as above but have not been responded to. Playworker informs coordinator who then talks with the child and parent/carer together. This can be at the end of the session or, depending on behaviour, during the session. Account written up within 24hrs of the session and discussed with the staff team and parent/carer. The matter is addressed through continued communication with the child and monitoring the child's behaviour using a reviewed behaviour file and working with the carers/parents until the situation is resolved.

LEVEL THREE: SERIOUS INCIDENT

For example: physical abuse of another child or adult, leaving the area without informing a playworker, using discriminatory language or behaviour. Continued disruptive behavior resulting in 3 incident forms within 1 week. Playworker informs Coordinator immediately and writes a detailed account of the event, which is filed. Procedures for level one are followed. If child does not respond the Coordinator contacts parents/carers immediately who, depending on the severity of the incident, may have to take their child home. This incident is discussed at the end of the session with the rest of the staff team and a procedure for dealing with the incident is decided upon. This is followed up by a letter or meeting with the parents/carers who need to be aware of the policy for dealing with the challenging behaviour. The matter is addressed through continued communication with the carer/parent and child until the matter has been resolved.

LEVEL FOUR: EXCLUSION

In very extreme situations where a child's behaviour is seriously affecting the life of the rest of the group then a Parent/carer will be asked not to bring their child to the club for an agreed period, to give both the child and the Club time to reflect.

ANTI BULLYING POLICY

The Starfish management committee, staff, children, and parents/carers must work together to create a club where bullying is not tolerated. Children should feel welcome, secure, and safe at Starfish and will be listened to by staff and adults about their concerns. The aim of the anti-bullying policy is to ensure that children play in a supportive, caring, and safe environment without fear of being bullied. Bullying is repeated anti-social behaviour directed towards a person. It is unacceptable and will not be tolerated.

What is bullying?

Bullying is deliberately hurtful behaviour that is repeated over time. This can be:

- Physical Violence
- Verbal (Being ridiculed, teased, or called names, being threatened with violence)
- Having money or other items taken
- Having belongings damaged
- Being ignored or left out in any activity for the reason of being hurtful
- Being picked on because of religion, background, or other protected/personal characteristics
- Spreading unpleasant stories about someone

The Management Committee and Staff

- We will discuss, monitor, and review our anti-bullying policy on a regular basis
- We will support staff to identify and tackle bullying appropriately
- We will ensure that children are aware that all bullying concerns will be dealt with sensitively and effectively
- We will report back quickly to parents/carers regarding their concerns on bullying
- We will seek to learn from anti bullying good practice elsewhere and seek support from the relevant statutory/voluntary organisations where appropriate and display positive anti-bullying information.
- Starfish staff will be vigilant for signs of bullying and will take reports of incidents seriously
- Staff will reinforce wherever possible through activities and play the Starfish anti-bullying policy and help children develop strategies to combat bullying behaviour
- Starfish staff will aim to raise the self-esteem of children, to achieve a situation where bullying is less likely to happen, create a climate where a disclosure of bullying is more likely and to take a consistent approach in dealing with bullying.
- Staff will be trained in recognising the signs of bullying
- Staff will encourage and praise positive behaviour and relationships between children

ANTI-BULLYING PROCEDURE

- Upon discovery of an incident of bullying, a member of staff will discuss with the children the issues appropriate to the incident and to their age and level understanding.
- Calmly talk to the children about it.
- Reassure the child that they have done the right thing in telling you about the bullying. All incidents of bullying should be formally recorded using an incident form and a copy passed to the child's school and parents if applicable.
- Make a note of what the child says – particularly who was said to be involved; how often the bullying has occurred; where it happened and what has happened (Use the Incident form).
- Explain that any further incidents that occur should be reported immediately,
- Monitor the situation and check with the child whether the bullying has stopped.
- Bullies will often not act alone and it's important to remember that you may be dealing with several pupils who are friends and who may give similar versions of events that differ to that of the victim.
- Once all the facts and have been established that bullying has taken place the coordinator will decide how to proceed and what sanctions are suitable. Much depends on the nature of the bullying.
- Parents will be confidentially informed and other children's names will not be used.
- If confirmed bullying at the club continues. The coordinator may suspend bullies and ask them to only attend the club under supervision

SAFEGUARDING (CHILD PROTECTION)

Starfish Kids Club is committed to building a 'culture of safety' in which the children in our care are protected from abuse, harm and radicalisation. Starfish Kids Club recognise that we have a duty and responsibility to provide an environment which keeps the children in our care safe from potential abuse and promotes their welfare (Children Act 1989).

The Club will respond promptly and appropriately to all incidents or concerns regarding the safety of a child that may occur. The Club's child protection procedures comply with all relevant legislation and with guidance issued the **Brighton & Hove City Council Front Door for Families**.

There is a Designated Safeguarding Lead (DSL) available at all times while the Club is in session. The DSL coordinates safeguarding and child protection issues, supports practitioners with safeguarding concerns and liaises with external agencies (eg Social Care and Ofsted).

The Club's designated DSL are; Ollie Malley – St Andrews, Jay Woods – St Pauls and Kelly Armstrong – Cottessmore. The on-call DSL is Charlie Wilson – General Manager.

The Club has detailed procedures for suitability checking for new recruits. These procedures are detailed in our Safe Recruitment policy and all staff responsible for recruitment ensure safe and robust recruitment practice is followed at all times.

Brighton & Hove Front Door for Families (FDFP) service is made up of professionals with different areas of expertise who work together to assess, decide, and coordinate how best to support children, young people, and their families where there are concerns. The FDFP includes:

- * Referral Officers - receive your calls, accept e-mails and online notifications, and can provide information, advice, and guidance
- * Social Workers - assess the needs or concerns raised about a child or young person.
- * Police Officers - assess information and notifications about children and young people coming to the attention of the Police.
- * Health Visitors - advise on the developmental needs of children with additional needs that are referred to the FDFP to ensure they receive the most appropriate support.
- * Education Safeguarding Officers - advise schools where there are safeguarding needs identified for a child.
- * Family Coaches – triage contacts that meet the threshold for targeted Early Help and Parenting Support and will assist partner agencies in setting up Team Around the Family meetings and plans.
- * Family Information Service - provide information and advice, through their online directory and Family Support Officers about access to childcare, access to support services and access to employment.

Any referrals made to Front Door for Families should also be made to Ofsted for their records.

For more information and to download all the relevant documents visit
www.brighton-hove.gov.uk/content/children-and-education/front-door-families

Safeguarding and promoting the welfare of children is defined as:

- Providing help and support to meet the needs of children as soon as problems emerge
- Protecting children from maltreatment, whether that is within or outside the home, including online
- Preventing the impairment of children's mental and physical health and development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes

SAFEGUARDING (CHILD PROTECTION) CONTINUED

Child abuse, neglect and exploitation

Child abuse, neglect and exploitation is any form of physical, emotional or sexual mistreatment or lack of care that leads to injury or harm. An individual may abuse, neglect or exploit a child directly, or by failing to protect them from harm. Some forms of child abuse, neglect and exploitation are listed below.

- **Emotional abuse** is the persistent emotional maltreatment of a child so as to cause severe and persistent adverse effects on the child's emotional development. It may involve making the child feel that they are worthless, unloved, or inadequate. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.
- **Physical abuse** can involve hitting, shaking, throwing, poisoning, burning, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may be also caused when a parent or carer feigns the symptoms of, or deliberately causes, ill health to a child.
- **Sexual abuse** involves forcing or enticing a child to take part in sexual activities, whether or not the child is aware of what is happening. This can involve physical contact, or non-contact activities such as showing children sexual activities or encouraging them to behave in sexually inappropriate ways.
- **Neglect** is the persistent failure to meet a child's basic physical and emotional needs. It can involve a failure to provide adequate food, clothing and shelter, to protect a child from physical and emotional harm, to ensure adequate supervision or to allow access to medical treatment.
- **Domestic Abuse:** Psychological, physical, sexual, financial, and emotional.

Signs of child abuse, neglect and exploitation

Signs of possible abuse, neglect and exploitation may include:

- significant changes in a child's behaviour
- deterioration in a child's general well-being
- unexplained bruising or marks
- comments made by a child which give cause for concern
- reasons to suspect neglect or abuse outside the setting, eg in the child's home, or that a girl may have been subjected to (or is at risk of) female genital mutilation (FGM), or that the child may have witnessed or be living with domestic abuse
- inappropriate behaviour displayed by a member of staff, or any other person. For example, inappropriate sexual comments, excessive one-to-one attention beyond the requirements of their role, or inappropriate sharing of images.

If abuse is suspected or disclosed

When a child makes a disclosure to a member of staff, that member of staff will:

- reassure the child that they were not to blame and were right to speak out
- listen to the child but not question them
- give reassurance that the staff member will take action
- record the incident as soon as possible (see *Logging an incident* below).

If a member of staff witnesses or suspects abuse, they will record the matter straightaway using the **welfare concern form**. If a third party expresses concern that a child is being abused, we will encourage them to contact Social Care directly. If they will not do so, we will explain that the Club is obliged to and the incident will be logged accordingly.

All staff recognise that children may not feel ready or know how to tell someone that they are being abused, exploited or neglected and/or they may not recognise their experiences as harmful. This could

SAFEGUARDING (CHILD PROTECTION) CONTINUED

be due to their vulnerability, disability or language barriers. They may also feel embarrassed, humiliated or are being threatened. Our staff recognise this and where they have any concerns about a child they will raise these with the designated safeguarding lead (DSL) without unreasonable delay.

Promoting awareness among staff

The Club promotes awareness of child abuse and the risk of radicalisation through its staff training. The Club ensures that:

- the designated DSL has relevant experience and receives appropriate training in safeguarding and the Prevent Duty, and is aware of the Channel Programme and how to access it
- DSLs receive Level 3 training every 2 years, with regular updates throughout this period
- all staff receive safeguarding training meeting the requirements of EYFS Annex C, which is refreshed at a maximum of 2 year intervals.
- annual refresher training will be offered to all staff in the form through accredited providers via online courses or through local authority training to help maintain basic skills. Staff are supported to implement learning through team meetings & supervisions
- procedures to ensure only suitable individuals are recruited, including obtaining references before employment commences, conducting identity and qualification checks, and recording all vetting information as part of safer recruitment processes are understood and followed by all responsible for recruitment, in line with our Safe Recruitment Policy
- all staff have a copy of this **Safeguarding Policy**, confirm their understanding of its contents and are vigilant to signs of abuse, neglect or radicalisation
- all staff are aware of how to respond in a timely way at the earliest opportunity
- all staff are aware of their statutory duties with regard to the disclosure or discovery of child abuse, and concerns about radicalisation
- safeguarding is a permanent agenda item at all staff meetings ensuring the whole team communicates well and are kept up to date
- all staff receive basic training in the Prevent Duty
- staff are supported to understand how to keep themselves safe and how to blow the whistle should they be concerned about another adults behaviour or practise
- the Club's procedures are in line with the guidance in 'Working Together to Safeguard Children (2023)' and staff have read and are familiar with 'What To Do If You're Worried A Child Is Being Abused (2015)'.
- The DSL and DDSL's will provide support, advice and guidance to all practitioners on an ongoing basis, and on any specific safeguarding issue as required.

CHILD ON CHILD ABUSE

Children are vulnerable to abuse by their peers. Child-on-Child abuse is taken seriously by staff and will be subject to the same child protection procedures as other forms of abuse. Staff are aware of the potential uses of technology and the internet for bullying and abusive behaviour between young people.

Staff will not dismiss abusive behaviour as normal between young people. The presence of one or more of the following in relationships between children should always trigger concern about the possibility of peer-on-peer abuse:

- Sexual activity (in primary school-aged children) of any kind, including sexting
- One of the children is significantly more dominant than the other (eg much older)
- One of the children is significantly more vulnerable than the other (eg in terms of disability, confidence, physical strength)
- There has been some use of threats, bribes or coercion to ensure compliance or secrecy.

If child-on-child abuse is suspected or disclosed

We will follow the same procedures as set out above for responding to child abuse.

Female Genital Mutilation (FGM)

FGM is an illegal, extremely harmful practice and a form of child abuse and violence against women and girls. FGM is therefore dealt with as part of our existing safeguarding procedures. All of our staff receive training in how to recognise when girls are at risk of FGM or may have been subjected to it.

If FGM is suspected or disclosed

We will follow the same procedures as set out above for responding to child abuse and will make a report to Children's Social Care directly.

Extremism and Radicalisation

All childcare settings have a legal duty to protect children from the risk of radicalisation and being drawn into extremism. There are many reasons why a child might be vulnerable to radicalisation, eg:

- feeling alienated or alone
- seeking a sense of identity or individuality
- suffering from mental health issues such as depression
- desire for adventure or wanting to be part of a larger cause
- associating with others who hold extremist beliefs

Signs of radicalisation

Signs that a child might be at risk of radicalisation include:

- changes in behaviour, for example becoming withdrawn or aggressive
- claiming that terrorist attacks and violence are justified
- viewing violent extremist material online
- possessing or sharing violent extremist material

If a member of staff suspects that a child is at risk of becoming radicalised, they will record any relevant information or observations on a **Welfare Concern Form**, and refer the matter to the DSL.

At Starfish Kids Club all staff are aware that abuse, neglect, exploitation and safeguarding issues are rarely standalone issues and events. In most cases multiple issues will overlap. Staff recognise that children might be at risk of harm inside and outside of their time in our club/setting, inside and outside of their home and whilst online. Our team exercise professional curiosity to help identify early signs of abuse, neglect and exploitation and act early in cases where children might need our help or protection.

All staff at Starfish Kids Club are aware of the indicators of abuse, neglect and understand that children can be at risk of harm inside and outside of the school/college, inside and outside of home, and online.

Staff exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff are able to identify cases of children who may be in need of help or protection.

All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines and radicalisation.

All staff at Starfish Kids Club are aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and other risks online as well as face to face. In many cases abuse and other risks will take place concurrently both online and offline. Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography to those who do not want to receive such content. In all cases, if staff are unsure, they always speak to the designated safeguarding lead or a deputy.

Logging a concern

All information about the suspected abuse, disclosure or concern, will be recorded on the **Welfare Concern Form** as soon as possible after the event. The record should include:

- date of the disclosure, or the incident, or the observation causing concern
- date and time at which the record was made
- name and date of birth of the child involved
- a factual report of what happened. If recording a disclosure, you must use the child's own words
- name, signature and job title of the person making the record.

The record will be given to the Club's DSL who will decide on the appropriate course of action.

For concerns about **child abuse**, the DSL will contact Social Care immediately in line with the local reporting procedures. The DSL will follow up all referrals to Social Care in writing within 48 hours.

If a member of staff thinks that the incident has not been dealt with properly, they may contact Social Care directly.

For minor concerns regarding **radicalisation**, the DSL will contact the Prevent Lead Officer in Brighton & Hove City Council or Counter Terrorism Police South East (CTPSE). For urgent concerns the DSL will contact the Police using 999.

Allegation Management Procedure:

This is the procedure for dealing with allegations made concerning any member of staff, volunteer, or committee member for any of the following reasons:

- Behaved inappropriately in a way that has or could have harmed a child.
- May have committed a criminal offence in relation to a child.
- Behaved towards a child or children in a way that indicates they are unsuitable to work with children.

Starfish will take any allegation seriously and recognises that we have a legal responsibility to act on every allegation made. Starfish recognises that this is not an assumption of guilt, but the protection of the children is paramount. The following procedure will be followed in every case:

- The allegation will be recorded and reported to the Named Safeguarding Officer (NSO) as soon as possible. If the allegations concern the NSO the allegation should be reported to the General Manager. (Charlie Wilson).
- The NSO must take measures to ensure the child's immediate safety and inform the Police if a crime has or may have been committed.
- The NSO and General Manager will talk to the person concerned and suspend them immediately from the setting on full pay or modify their duties.
- The NSO/ General Manager will inform the Local Authority Designated Officer for Allegations Management (LADO) who will offer advice and guidance on how to proceed:

LADOenquiries@brihgtton-hove.gov.uk

Depending on the nature and seriousness of the allegation it will either be dealt with in the setting following Starfish's Disciplinary Procedure, or with a multi-agency approach.

Disciplinary Procedure:

- Advice and guidance given by LADO will be recorded on appropriate form and kept in confidential file.
- Timescales will be followed in accordance with Working Together to Safeguard Children (Action must be taken within 3 days).
- Starfish's Disciplinary procedure will be followed.
- The NSO/ General Manager will inform the LADO and Ofsted of the outcome of the investigation.

Multi Agency:

- If the LADO decides the allegation needs to proceed to an allegations strategy meeting, this will be convened in accordance with Procedures for Working Together to Safeguard Children.

WHISTLEBLOWING (PUBLIC INTEREST DISCLOSURE) POLICY

Starfish Kids Club is committed to the highest standards of openness, probity and accountability. If a member of staff discovers evidence of malpractice or wrongdoing within the Club they can disclose this information internally without fear of reprisal. Our **Whistleblowing** policy is intended to cover concerns such as:

- Financial malpractice or fraud
- Failure to comply with a legal obligation
- Dangers to health and safety or the environment
- Criminal activity
- Improper conduct or unethical behaviour

This policy should not be used to question business decisions made by the Club, or to raise any matters that are covered under other policies (eg discrimination or racial harassment). Any allegations relating to child protection will follow the procedures set out in the **Safeguarding Children policy**. Any concerns relating to the employment conditions of an individual member of staff should be raised according to the procedures set out in the **Staff Grievance policy**. All staff will be made aware of these whistleblowing procedures as part of their safeguarding training and induction.

Raising a concern

Ideally the staff member should put his or her allegations in writing, setting out the background to the situation, giving names, dates and places where possible, and the reason why they are concerned about the situation.

In the first instance concerns should be taken to the Club's Coordinator. If an employee or volunteer feels the matter cannot be discussed with the coordinator, they should contact the chair of the committee, Kevin Thomas on 07762 550 036 or General Manager Charlie Wilson on 07941 525291, or OFSTED on 0300 123 1231 for advice on what steps to follow.

If this person or body is unwilling or unable to act on the concern, the staff member should then raise it with:

- Ofsted (if it concerns the safe and effective running of the club)
- The Local Authority Designated Officer or the Local Safeguarding Partnership (if it concerns a child protection issue and is not already covered by the procedure set out in the Club's **Safeguarding Children policy**)
- Ultimately, with the police (if a crime is thought to have been committed).

If the member of staff is still uncertain about how to proceed with the concern, he or she can contact the whistle-blowing charity Protect for advice.

Where a staff member feels unable to raise an issue with their employer, or feels that their genuine concerns are not being addressed, other channels are open to them:

- NSPCC whistleblowing advice line is available. Staff can call 0800 0280285 – 08:00 to 20:00, Monday to Friday and 09:00 to 18:00 at weekends. The email address is: help@nspcc.org.uk. Alternatively, staff can write to: National Society for the Prevention of Cruelty to Children (NSPCC), Weston House, 42 Curtain Road, London EC2A 3NH.
- Ofsted provides guidance on how to make complaints about a childcare provider: Complaints procedure - Ofsted - GOV.UK (www.gov.uk).
- General guidance on whistleblowing can be found via: Whistleblowing for employees.

Responding to a concern

Initial enquiries will usually involve a meeting with the individual raising the concern, and will decide whether an investigation is appropriate and, if so, what form it should take. If a concern relates to issues which fall within the scope of other policies, it will be addressed under those policies.

If the initial meeting does not resolve the concern, further investigation is required. The appropriate person will investigate the concerns thoroughly, ensuring that a written response can be provided within ten working days where feasible, or if this is not possible, giving a date by which the final response can be expected. The response should include details of how the matter was investigated, conclusions drawn from the investigation, and who to contact if the member of staff is unhappy with the response and wishes to take the matter further.

Rights and responsibilities of the whistle-blower

All concerns will be treated in confidence and the Club will make every effort not to reveal the identity of anyone raising a concern in good faith. At the appropriate time, however, the member of staff may need to come forward as a witness.

If a member of staff raises a concern in good faith which is then not confirmed by the investigation, no action will be taken against that person.

If the investigation concludes that the member of staff maliciously fabricated the allegations, disciplinary action may be taken against that person.

Contact information

LADO (Local Authority Designated Officer Designated Officer LADO: Kay Whitcroft

Email: LADOenquiries@brighton-hove.gov.uk Tel: 07584 217271

Local Authority Safeguarding Team: Brighton & Hove: 01271 29 55 55 Brighton (John Street)

Ofsted: 0300 123 1231

Protect (formerly Public Concern at Work): 020 3117 2520 (website: <https://protect-advice.org.uk>)

Related policies

Staff Grievance policy, Safeguarding Children policy.

Written in accordance with the *Statutory Framework for the Early Years Foundation Stage (2025): Safeguarding and Welfare requirements: Whistleblowing [3.7, 3.8]*

SOCIAL NETWORKING, MOBILE PHONE AND WEARABLE TECHNOLOGY POLICY

At Starfish we recognise that the rise in the use of social networking by children is a cause for concern regarding their safety. Staff must always be aware of their responsibilities when accessing social networking sites and be conscious of the need to keep their personal and private lives separate and be aware of their duty of confidentiality to the children attending Starfish, their families, colleagues, and employer.

We are also aware of the rise in numbers of young children who own smart phones and other new technology that has many functions including camera and/or internet access. Our concern is of children taking photographs others within the setting and with using the internet, either to access unsuitable sites or upload photographs taken. As part of our Prevent Duty it is also important for us to ensure that children are safe from accessing extremist content online by closely monitoring any internet use at club if this occurs at all.

- These procedures are produced in line with good practice and will be updated to reflect legislative measures likely to come into effect in the near future.
- Staff will not download images containing photographs of children from Starfish ASC's or holiday Play Scheme, or any images which may identify the setting in any way.
- Staff are not to have their personal phones on their person in the setting, it should be kept in their bag. Staff should not use their personal mobile phones onsite except during pickups. They should keep their phones on their person whilst off-site in case of an emergency in order to pick up messages and calls, if there is no club phone available.
- Under no circumstances should staff take photos of the children on personal phones or digital cameras or other wearable devices
- Children's mobile phones will not be used in the session, unless as agreed between coordinator and parent/carer for communication purposes. Children should leave their phones switched off. If this is not followed, they will be asked to leave their phones on the front desk for the duration of the session. Other devices may be used under supervision and at the discretion of the coordinator.
- Where internet use is permitted this will be closely monitored by staff to ensure that children are safe from accessing extremist material online.
- Staff will not publish any photographs, videos, or any other form of images of children from the setting unless this is agreed with the child and parent/carer.
- Staff will not discuss information about the children in Starfish or their families on any social networking site.
- Staff will not discuss or publish details relating to the setting, or make personal comments regarding work related issues, or colleagues. Gossiping about work related subjects is a breach of confidentiality.
- To keep appropriate professional boundaries staff will not have contact with parents or carers of children attending Starfish through social networking sites via their personal accounts.
- Staff will not have contact with children attending Starfish through social networking sites.
- Staff are advised to set the privacy settings on any personal social networking site as strictly as possible so personal details cannot be accessed.
- Staff are advised not to reveal their home address, telephone number, place of work or work address on any social networking site.
- Staff will not use a work-related email address to access social networking sites, except to manage the club's accounts.
- **Staff are aware that any inappropriate disclosures affecting or impacting on the welfare of the children, staff or Starfish Kids Club Ltd will be subject to disciplinary procedure.**

It is also notable that parents should not use their phones in the club, unless at the front desk under the supervision of a member of staff. Parents will be reminded of this in regular newsletters and posters.

STAFF SOCIAL MEDIA GUIDE

Starfish Kids Club may have a presence on social media sites such as Twitter, Instagram, and Facebook. These accounts are managed by the General Manager who is adequately trained in safeguarding and follows the local council's guidance on social media safe practice. Individual employees may choose to have their own personal accounts which they manage and are not affiliated with the Club. Starfish Kids Club provides some Social Media Practice principles to consider in this case:

- Starfish staff need to be aware that everything they post online is public, even with the strictest privacy settings. Once something is online, it can be copied and redistributed, and it is easy to lose control of it. They should therefore assume that everything they post online will be permanent and will be shared.
- Starfish staff must be conscious at all times of the need to keep their personal and professional lives separate and to always maintain appropriate professional boundaries.
- Staff members are responsible for their own actions and conduct. They should avoid behaviour which might be misinterpreted by others, or which could put them in a position where there is a conflict between their work and their personal interests. They should use social media in a professional, responsible, and respectful way and must comply with the law, including equalities legislation, in their on-line communications.
- Staff members should not engage in activities involving social media which might bring the setting into disrepute and must not represent their personal views as those of the setting on any social medium.
- They must not discuss personal information about children, their family members, staff or any other professionals or organisations they interact with as part of their job on social media. They also must not name or otherwise identify children, former children or their parents, family members and working colleagues past and present in social media conversations.
- Staff members must not use social media or the internet in any way to attack, insult, abuse, defame or otherwise make negative, offensive, or discriminatory comments about children, their family members, colleagues, other professionals, other organisations.
- Staff should act in the best interests of children and young people when creating, participating in, or contributing content to social media sites.

MEDICATION POLICY

If a child attending Starfish requires medication of any kind, their parent or carer must complete a Permission to administer medicine form in advance. Staff at the Club will not administer any medication without such prior written consent. If possible, children will be encouraged to take personal responsibility for their medication, if appropriate. If children carry their own medication (eg asthma inhalers), the Club staff will offer to keep the medication safe until it is required. Inhalers must be labelled with the child's name.

Prescription medication

Starfish staff will normally only administer medication that has been prescribed by a doctor, dentist, nurse or pharmacist. All prescription medication provided must have the prescription sticker attached which includes the child's name, the date, the type of medicine and the dosage.

Non-prescription medication

If a child requires a non prescription medication to be administered, we will consider this on a case by case basis after careful discussion with the parent or carer. We reserve the right to refuse to administer non prescription medication.

Procedure for administering medication

A designated staff member will be responsible for administering medication or for witnessing self-administration by the child. The designated person will record receipt of the medication on an administering medicine sheet, will check that the medication is properly labelled, and will ensure that it is stored securely during the session.

Before any medication is given, the designated person will:

- Check that the Club has received written consent
- Ask another member of staff to witness that the correct dosage is given.

When the medication has been administered, the designated person must:

- Record all relevant details on the administering medicine sheet
- Ask the child's parent or carer to sign the form to acknowledge that the medication has been given.

When the medication is returned to the child's parent or carer, the designated person will record this on the administering medicine sheet. If a child refuses to take their medication, staff will not force them to do so. The manager and the child's parent or carer will be notified, and the incident recorded on the administering medicine sheet.

Specialist training

Certain medications require specialist training before use, eg Epi Pens. If a child requires such medication the manager will arrange appropriate training as soon as possible. It may be necessary to absent the child until such training has been undertaken. Where specialist training is required, only appropriately trained staff may administer the medication.

Changes to medication

A child's parent or carer must complete a new administering Medicine sheet if there are any changes to a child's medication (including change of dosage or frequency). Long term conditions If a child suffers from a long term medical condition the Club will ask the child's parents to provide a medical care plan from their doctor, to clarify exactly what the symptoms and treatment are so that the Club has a clear statement of the child's medical requirements.

DRUGS, ALCOHOL + SMOKING POLICY

Drugs

Playworkers or volunteers who arrive at Starfish Kids Club clearly under the influence of illegal drugs will be taken aside and questioned and disciplinary procedures may be implemented. Children who arrive at club clearly under the influence of illegal drugs will be taken aside and their parents will be called.

If a child is found in possession of illegal drugs on the premises, the drugs will be confiscated, and their parent will be informed immediately. If playworkers are found in possession of illegal drugs, serious disciplinary action will follow. In both cases the police may be called.

In cases where Playworkers are taking prescribed drugs that may affect their ability to function effectively at work, the coordinator or General Manager should be informed as early as possible, and a risk assessment will be completed.

Playworkers are required to notify Starfish Kids Club of any changes to their health and suitability to work at their annual appraisal at the latest, to ensure there has been no change in circumstances.

Playworkers should be very careful not to make any reference to illegal drugs whilst at club, especially whilst supervising children. If it is apparent that drug references have been made in front of children, disciplinary action may be taken.

Alcohol

Playworkers, students, volunteers who arrive at Starfish Kids Club clearly under the influence of alcohol will be taken aside and questioned and disciplinary procedures will be implemented. Children, who arrive at Starfish clearly under the influence of alcohol, will be taken aside and parents contacted.

If a child is found in possession of alcohol on the premises the alcohol will be confiscated, and their parent will be informed immediately. Playworkers must not bring alcohol onto Starfish premises.

If a Playworker has good reason to suspect that a parent is under the influence of alcohol when they drop off or collect their child, to the extent that the safety of the child is threatened, they have a duty to inform the designated Child Protection Safeguarding Officer, according to the provisions of the Starfish Safeguarding Policy.

The Child Protection Safeguarding Officer will then be responsible for deciding on the appropriate course of action, ensuring that the safety and protection of the child always remains paramount.

Playworkers should be very careful not to make any reference to alcohol whilst at club, especially whilst supervising children.

Smoking

Smoking is not permitted anywhere on the premises. This rule applies equally to playworkers, volunteers, children, parents, or any other visitors.

If a child is found in possession of cigarettes on the premises, the cigarettes will be confiscated, and their parent informed.

Playworkers should be very careful not to make any reference to smoking whilst at club, especially whilst supervising children.

Parents under the Influence

If a playworker has good reason to suspect that a parent is under the influence of illegal drugs or alcohol when they drop off or collect their child, they have a duty to inform the Child Protection Safeguarding Officer, who, according to the provisions of the Safeguarding policy will then be responsible for deciding upon the appropriate course of action, ensuring that the safety and protection of the child always remains paramount.

Playworkers will make all possible efforts to ensure that children are not allowed to travel in a vehicle driven by someone under the influence of illegal drugs. Where an illegal act is suspected, the police will be called.

SAFER RECRUITMENT

Starfish Kids Club uses safe recruitment practices to ensure that all people working with the children in our care are safe and qualified to do so. When recruiting paid staff or volunteers we will follow the procedures set out below.

Advertising the vacancy

We will advertise all vacancies, and any job advertisements will include a statement about our commitment to safeguarding children.

Initial enquiry

Upon enquiring about a vacancy, we will send potential candidates:

- a job description
- a person specification
- an application form
- a copy of the Club's **Safeguarding Children** policy and information about our Safe Recruitment processes.

The application form includes:

- a declaration that all information is correct
- whether the candidate will submit a self-declaration form under to disclose any relevant information under the Rehabilitation of Offenders Act
- a request for the contact details of two referees one of which should be the last employer; (if this is the candidate's first job, their course tutor is a suitable alternative or three character references

All applicants must submit a application form by the closing date. We will only accept CVs if they are accompanied by our standard application form completed as required.

Starfish Staff Suitability Declaration

Using a self-disclosure form gives candidates the opportunity to tell us confidentially about any relevant criminal convictions, child protection investigations or disciplinary sanctions they have on their record. Starfish Kids Club is only able to request information that we are entitled to know about as a potential employer. By using a self-disclosure form we ensure that we only receive information that we need to make a decision about suitability and recognises that self-disclosure forms contain sensitive, confidential information.

Forms should be submitted in a separate, sealed envelope marked 'Confidential' and will be opened for candidates successful at interview. The self-disclosure form does not replace the need for an enhanced criminal record check, which should always be carried out as appropriate to the role.

Interview procedure

We will notify all candidates selected for interview by email. All candidates will be asked to bring to the following items to the interview:

- proof of identity, eg passport, driving licence or birth certificate
- proof of address, eg recent utility bill (not mobile phone) or bank statement
- proof of qualifications, ie the relevant certificates
- for non-British nationals, proof of the right to work in the UK (as required by the Asylum and Immigration Act)

The interview will be conducted by at least two interviewers. All candidates will be asked the same set of questions. We will then ask additional questions about any other issues that arise from their application form. For example, the interviewers will follow up on any gaps in the candidate's employment history rigorously and ensure that they are satisfied with the explanation given, undertaking additional checks if necessary.

All candidates will also be asked to participate in a session with the children for an hour so that they can be observed interacting with the staff and children. When we have interviewed and observed all candidates, we will make our final selection.

Appointing a new member of staff

When we have selected the successful candidate, we will:

- send the candidate a written offer, which will clearly state that it is subject to the receipt of suitable references, full sight of a satisfactory enhanced DBS certificate and their written confirmation that they are not disqualified from working with children.
- contact referees for a reference, including asking them if they have any child protection concerns about the candidate.
- initiate an enhanced DBS check for the candidate, or if the candidate is subscribed to the DBS Update Service, review their current DBS certificate and check their status online
- ask the candidate to complete a health questionnaire
- notify any unsuccessful interviewees.

References:

References must be obtained from the applicant's current employer (or training provider) before employment commences. References must be provided in a timely manner and must confirm whether the employer is satisfied with the employee's suitability to work with children.

Starfish Kids Club will not accept open references (addressed "to whom it may concern" or similar, or references from a family member. Starfish Kids Club will not ask applicants to obtain their references on our behalf and will check, by follow up phone call or other verification, that electronic references originate from a legitimate source. Once references are received, Starfish Kids Club will compare the information on the application form with that in the reference and take up any discrepancies with the candidate. Starfish Kids Club will follow up any discrepancies to establish the reason for the candidate leaving their current or most recent post, and where information provided in a reference is vague or insufficient, we will follow up with the referee for additional context. We will ensure any concerns are resolved satisfactorily before appointment is confirmed.

We will also take photocopies of the new member of staff's qualification certificates and take details of the proof of identity documentation that has been reviewed and keep these on file. All identity checks, and vetting processes and references that have been completed, criminal records checks and reference number, the date a check was obtained and details of who obtained it will be recorded.

When a new member of staff starts work at Starfish Kids Club we will give them:

- our terms and conditions, and get them to sign their contract; a copy of their contract will be kept on file
- all our Club policies, and ensure that they sign a policy confirmation form to confirm that they have read and understood them; the signed form will be kept on file.

We will conduct a full induction and orientation programme with all new members of staff as set out in our **Staff Induction policy**.

Disqualification

The Club cannot employ staff or volunteers who have been convicted of specific offences or have been subject to an order that disqualifies them from registration under section 75 of the Childcare Act 2006. All new staff must sign a declaration that they are not disqualified when they commence employment and all existing staff must sign the declaration annually to confirm that their status has not changed. If a member of staff becomes disqualified during their employment with us, we will terminate their employment and notify Ofsted and make a referral to the Vetting and Barring Scheme.

DBS checks

We will obtain enhanced DBS disclosures for all staff, students and volunteers who will work unsupervised with the children on a regular basis, or who have access to children's information, including members of the management committee and volunteers.

If candidates have subscribed to the DBS Update Service we will carefully review their current DBS certificate and then check their status online. If there has been a change in their status since their last DBS certificate was issued we will obtain a new DBS disclosure for them. Additional criminal records

checks will be made for anyone who has lived abroad. We will not request a new Enhanced DBS check for each new member of staff regardless of Update Service membership. New staff will only be allowed to have ***unsupervised contact with children*** when we have had full sight of a satisfactory enhanced DBS certificate for them. If we decide to allow a new member of staff to begin work pending the completion of their DBS check, we will complete a written risk assessment first and they will *not be allowed unsupervised access* to the children until we have seen and reviewed their DBS certificate. When we appoint a member of staff we will keep a record of the date and number of their DBS disclosure on our **Staff File Checklist**. We will update the DBS checks for all staff every 3 years.

DBS checks with any recorded information

If the DBS check returns showing criminal records information relating to harm to children or young people, violence, sexual assault, child sexual abuse images, terrorism offences, or anything else that might indicate they are unsuitable to work with children, the Manager will firstly check the list of offences that automatically disqualify a person from working with children under the terms of the Childcare Act 2006. The list is available here:

<https://www.gov.uk/government/publications/disqualification-under-the-childcare-act-2006>

The Manager may seek further advice from social care or the LADO (Local Authority Designated Officer) if they are unsure whether the disclosed offence is on the list of disqualifiable offences.

If the candidate's offences disqualify them from working with children then the offer of employment will be withdrawn.

If the offence shown on the disclosure is not on the list of disqualifying offences but still gives cause for concern, for example offences relating to theft or fraud or anything else that might pose a risk to the integrity of the club, the Manager may choose to seek further advice (eg from UNLOCK or NACRO) to help inform their decision.

Where the offences are more minor and where children are unlikely to be at risk of harm, the Club will decide on a case by case basis whether to confirm the appointment. This decision will be subject to undertaking a risk assessment of the applicant's criminal record. This will include giving the applicant the opportunity to provide an explanation for the offences, as well as the circumstances at the time. We will assess the applicant's attitude to their offences, and whether they would act differently now.

In all cases we will discuss any matter revealed on a DBS certificate with the applicant before withdrawing the conditional offer of employment.

Immigration status

The management is aware of Asylum and Immigration Act requirements and will check the eligibility of all new starters to work in the UK. Candidates are expected to provide documents confirming their status, usually a driving licence, passport, and NI number.

Equality Act 2010

At all points during the recruitment process, Starfish Kids Club will comply with the Equality Act 2010 to ensure the fair and equal treatment of practitioners of different gender, race, and sexual orientation etc.

STAFF DISCIPLINARY PROCEDURE

Starfish Kids Club will strive to maintain a well-motivated, highly skilled, and professional playwork team. However, occasionally action will need to be taken to encourage improvement in individual behaviour and performance.

If a worker is subject to disciplinary action, fair and consistent procedures will be employed. Investigations will be non-discriminatory and apply equally to all workers irrespective of sex, marital status, sexual preference, race, Disability or other protected characteristics. Workers will be given the opportunity to state their case, and be accompanied by a colleague of their choice, during any part of the disciplinary process. Workers will not be dismissed for a first breach of discipline except in the case of gross misconduct (see below).

Either the coordinator or General Manager will conduct investigations after taking advice from the management committee where appropriate. Workers have a right to appeal against any action taken against them. The Disciplinary Procedure operates as follows:

Informal Discussion

Before taking formal action, the coordinator/General Manager will make every effort to resolve the matter by informal discussions between parties concerned. A plan of action will be drawn up detailing how the coordinator / General Manager expects improvements in practice to be made. If a satisfactory outcome or improvements are not reached, a formal discussion will take place.

Formal Procedure

First stage of formal procedure

This will normally be either:

- an improvement note for unsatisfactory performance if performance does not meet acceptable standards. This will set out the performance problem, the improvement that is required, the timescale, any help that may be given and the right of appeal. The individual will be advised that it constitutes the first stage of the formal procedure. A record of the improvement note will be kept for 6 months, but will then be considered spent – subject to achieving and sustaining satisfactory performance

or

- a first warning for misconduct if conduct does not meet acceptable standards. This will be in writing and set out the nature of the misconduct and the change in behaviour required and the right of appeal. The warning will also inform the employee that a final written warning may be considered if there is no sustained satisfactory improvement or change. A record of the warning will be kept, but it will be disregarded for disciplinary purposes after a period of 12 months.

Final written warning

If the offence is sufficiently serious, or if there is further misconduct or a failure to improve performance during the currency of a prior warning, a final written warning may be given to the employee. This will give details of the complaint, the improvement required and the timescale. It will also warn that failure to improve may lead to

dismissal (or some other action short of dismissal) and will refer to the right of appeal. A copy of this written warning will be kept by the supervisor but will be disregarded for disciplinary purposes after 12 months subject to achieving and sustaining satisfactory conduct or performance.

Dismissal or other sanction

If there is still further misconduct or failure to improve performance the final step in the procedure may be dismissal or some other action short of dismissal such as demotion or disciplinary suspension or transfer (as allowed in the contract of employment). Dismissal decisions can only be taken by the appropriate senior manager, and the employee will be provided in writing with reasons for dismissal, the date on which the employment will terminate, and the right of appeal. If some sanction short of dismissal is imposed, the employee will receive details of the complaint, will be warned that dismissal could result if there is no satisfactory improvement, and will be advised of the right of appeal. A copy of the written warning will be kept by the supervisor but will be disregarded for disciplinary purposes after 12 months subject to achievement and sustainment of satisfactory conduct or performance.

Gross Misconduct

If it is brought to the attention of the coordinator / General Manager that a worker has committed an act of the following nature, dismissal will be the normal outcome following the matter being investigated:

- Child abuse (for further details refer to the Safeguarding policy)
- Serious infringement of health and safety rules
- Assaulting another person
- Persistent bullying, sexual or racial harassment
- Being unfit for work through alcohol or illegal drug use
- Bringing drugs or alcohol onto the premises
- Gross negligence that either causes or might cause injury, loss or damage to persons or property
- Theft, fraud, or deliberate falsification of Starfish Kids Club documents
- Deliberate damage to Starfish Kids Club property
- Serious misuse of Starfish Kids Club's name
- Deliberately accessing internet sites containing pornographic, offensive, or obscene material
- Serious insubordination
- Unlawful discrimination or harassment
- Bringing the organisation into serious disrepute
- A serious breach of health and safety or safeguarding rules
- A serious breach of confidence
- Being an unfit person under the terms of the Care Standards Act 2000 or the Children's Act 1989.

If you are accused of an act of gross misconduct, you may be suspended from work on full pay, normally for no more than five working days, while the alleged offence is investigated. If, on completion of the investigation and the full disciplinary procedure, the organisation is satisfied that gross misconduct has occurred, the result will normally be summary dismissal without notice or payment in lieu of notice. Depending on the offence, the police and local authority may be notified.

Appeals

An employee who wishes to appeal against a disciplinary decision must do so within five working days. The senior manager will hear all appeals and their decision is final. At the appeal any disciplinary penalty imposed will be reviewed.

GRIEVANCE PROCEDURE

Dealing with grievances informally

If you have a grievance or complaint to do with your work or the people you work with you should, wherever possible, start by talking it over with your manager. You may be able to agree a solution informally between you. Formal grievance

If the matter is serious and/or you wish to raise the matter formally you should set out the grievance in writing to your manager. You should stick to the facts and avoid language that is insulting or abusive. Where your grievance is against your manager, and you feel unable to approach him or her you should talk to another manager or a member of the committee.

Grievance hearing

Your manager will call you to a meeting, normally within five days, to discuss your grievance. You have the right to be accompanied by a colleague at this meeting if you make a reasonable request. After the meeting the manager will give you a decision in writing, normally within 24 hours.

Appeal

If you are unhappy with your manager's decision and you wish to appeal you should let your manager know. You will be invited to an appeal meeting, normally within five days, and your appeal will be heard by a more senior manager or committee member. You have the right to be accompanied by a colleague at this meeting if you make a reasonable request. After the meeting the manager or committee member will give you a decision, normally within 24 hours. The manager or committee member's decision is final.

CAPABILITY POLICY

Starfish will employ staff (and volunteers) with suitable qualifications and experience for their role. Their suitability to work with children will be assessed and assured in an ongoing process of appropriate training supervision and appraisal so they continue to carry out their work to the high standards expected of them. (see recruitment policy). Where concerns about their performance is found to be due to negligence, misconduct, or consistent lack of application by the member of staff, the Disciplinary Procedure will be followed.

However, Starfish recognises that substandard performance may relate to lack of knowledge, training, or personal issues. In this instance, the member of staff will be given reasonable time, with appropriate assistance to achieve the required standard.

This policy is intended to:

- Secure the required improvement in areas where the member of staff is falling short of performance expected of them.
- Identify areas in need of improvement and help the member of staff to improve their performance.
- Provide a fair and effective means of improving performance in areas needed, secure redeployment to a more suitable position or where this is not possible or practicable, dismissal.

Starfish recognises that a capability issue does not necessarily lead to disciplinary action. However, as any meeting concerning a member of staff's performance could result in a formal warning, that member of staff has the right to be accompanied by a work colleague. At each stage of the process the employee will be advised of the nature of the issue, the necessary improvement required, and the consequences of failure to maintain a satisfactory level of performance.

Informal Procedure:

If a member of staff's performance becomes a matter of concern the coordinator will keep informal notes detailing the nature of the concerns and the occasions on which they occur.

The coordinator will discuss the issue with the General Manager and consideration will be given to cultural, disability or other equal opportunity issues which may be a factor. Changes in the individual's personal situation or health will also be taken into consideration. A decision will be made whether to monitor the situation for up to six months, or to take further action as follows:

- coordinator will meet informally with the member of staff and explain in what way their performance is falling short.
- coordinator will consider staff development or training opportunities if applicable and discuss.
- coordinator will discuss options with General Manager.
- Clear written performance targets with a realistic timescale for improvement will be agreed in writing and given to the member of staff.
- Performance will be regularly reviewed until targets are met.

Where the informal process has been followed and there continues to be significant issues formal action will be taken.

Formal Procedure:

- The coordinator will discuss the issue with the General Manager. A meeting will take place with the coordinator, and General Manager and the member of staff, who may have a work colleague present. The cause of the problem, job requirements, and any shortfall in their ability knowledge or skills addressed.
- A plan for improvement will be agreed at this meeting or a further meeting arranged. The General Manager will document the agreed areas of improvement required the timescales, and a review date.
- Two copies of the document will be made and signed by General Manager, coordinator, and employee to demonstrate agreement on the targets for improvement. The employee will be given a copy and the other kept on the member of staff's file.
- The employee must be advised that should the necessary improvements not be achieved; their continuing employment may be at risk.

Review Meeting:

- The general manager, coordinator, and employee (with work colleague if they wish) should attend agreed review meeting.
- coordinator will discuss what has taken place in the review period and listen to the employee's view.
- The General Manager will consider the employee's response and any ongoing concerns of the coordinator.
- Consideration will be given to redeploying the member of staff.
- Either the matter will be considered resolved, and the employee's performance kept under review, or a new document produced to show areas that are still in need of improvement, timescales, and a new review date set. It will be made clear at this stage that their job is seriously at risk if the required level of improvement is not achieved and sustained.

Final Review with General Manager:

- Conducted as above, but with additional possible outcome of dismissal on the grounds of capability. The employee will be advised of their contractual period of notice of termination of employment and of their right to appeal against the decision.

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Appeals:

An employee who wishes to appeal against a capability decision other than dismissal, should inform the coordinator within 10 working days. The General Manager and the committee will hear all appeals and their decision will be final.

The capability target(s) can be reviewed but not decreased.

Appeal against dismissal:

Any employee who is dismissed will receive a formal letter stating the reasons for dismissal. The employee should write to the General Manager within 14 days of the date of the dismissal letter indicating reasons for appeal.

Starfish reserves the right to amend this policy. Staff will be notified of any amendments through the coordinator or in writing.

STAFF ABSENCE POLICY

Principles

The purpose of this policy is to set out what treatment staff members can expect from Starfish Kids Club if they suffer sickness or injury or if they are absent from work for other reasons. Staff attendance is important to the business and is monitored. This policy identifies points at which Starfish will act if sickness absence reaches unacceptable levels. The overriding aim is to ensure a healthy, productive workforce, not to punish staff members for being unwell. However, Starfish cannot ignore the effects on the services and on other employees of lateness or absence from duty, whatever the cause.

Statutory Sick Pay

Staff members are entitled to Statutory Sick Pay (SSP) when they are absent from work due to sickness, as long as they reach the eligibility criteria set out on the government website:

<https://www.gov.uk/statutory-sick-pay/eligibility>

The main features of the scheme are:

- The first three days of incapacity are unpaid (called 'waiting days')
- Further sickness is paid via SSP for up to 28 weeks.
- If two periods of sickness are separated by less than eight weeks (56 days) then they are linked, and the employee need not serve the waiting days again.

Company sick pay scheme

Starfish currently does not operate a company sick pay scheme.

Short-term absence

The line manager in question will formally review a staff absence record if in a single half term period (6 weeks) period there are two separate periods of absence (whether these are certificated or not), or if there is an unacceptable pattern of absence, for example, regular time off on Mondays or Fridays.

Long-term absence

'Long-term absence' is a period of sickness which lasts longer than two calendar weeks. Starfish takes a sympathetic view about genuine ill-health problems and will provide a supportive approach to all employees in such circumstances. Their line manager will monitor absence and will counsel staff members through a period of sickness absence. If, after discussion, it appears that the member of staff is likely to be away from work for more than four weeks Starfish will maintain regular contact using agreed channels. The Company will make contact to find out the reason for the absence (including requesting medical information where appropriate), the likely duration of the absence and if there are any steps that Starfish or the staff member can take to speed up the return to work.

Ultimately, if absence does reach problematic levels, then the Company may have no choice but to dismiss the staff member. The point at which this action may be taken will depend on the nature of the job and the difficulty caused to the company by a member of staff's continued absence. Dismissal will be regarded as a last resort and the company will try to ensure that the following criteria are fulfilled:

- Relevant medical information is sought and considered.
- Options for alternative duties or working arrangements are examined.
- The staff member's views will be considered.

Before any dismissal the company will comply with any applicable statutory dismissal procedure.

Return to work interviews

When a staff member returns to work from any absence (excluding holidays) their line manager will check with them that they are fit to return, update them on any important matters they may have missed and may discuss their absence record if appropriate.

Medical information

If absences reach excessive levels, Starfish Kids Club may require medical information about a member of staff's condition from their GP and/or a specialist practitioner of the Company's choosing. This will normally be part of the Fit for Work scheme if their sickness absence reaches 4 weeks or more. If Starfish needs a report from a GP, the Company will comply with the Access to Medical Reports Act 1988, which requires that:

- The Company obtains the staff member's written consent before we contact their GP.
- The staff member is given prior access to the report and can refuse the Company access to it if they wish.
- The staff member can ask their GP to alter the contents of the report if they feel it is inaccurate.

If their GP does not wish changes to be made, they can ask their GP to attach a statement of their views to the report. However, if the staff member refuses to supply relevant medical information the Company may have no choice but to make decisions about their likely return to work based on the information that is available.

Therefore, it is in the staff member's best interests to disclose medical information.

Staff Absence Guide

Absence from work for whatever reason must be notified to the General Manager or coordinator before 11:00am on the first day of absence and before the time the staff member is due to start work in any event.

Where the staff member returns to work within five working days of the commencement of an absence due to sickness or injury, they must self-certify their absence verbally or by letter without delay.

Where they are away from work for more than five working days due to sickness or injury, they must obtain a certificate from their doctor and forward it to Starfish without delay. If their absence due to sickness or injury is prolonged, they must obtain further certificates from their doctor to cover such absence and forward them to the group coordinator.

Statutory Sick Pay ("SSP") will be paid by Starfish Kids Club according to any rates in force from time to time for all periods of sickness.

Any payments which the Company may make in addition to any entitlement to SSP shall be in the absolute discretion of the Company and no contractual entitlement to any additional pay over and above SSP during any period of absence due to sickness arises in this contract.

Staff members agree to undergo, at any time during their employment and at the Company's expense, a medical examination by a doctor of the Company's choice and to the disclosure of a medical report following such examination to the General Manager. In either case no clinical or medically confidential information will be disclosed other than to the board of directors of the Company without the staff member's express written authority. During any period of long-term sick leave (long-term being defined as 4 weeks or more) staff members agree to attend any reasonable meetings with the Company and/or any other person legitimately nominated by the Company to discuss non-medical matters relating to sickness absence and any return to work. Any unreasonable refusal to co-operate in this regard, without good cause, refusal to or failure to correspond or communicate with management could lead to summary dismissal. Only where an expert medical practitioner certifies that any such communication would seriously harm or worsen a member of staff's mental condition, would management deem it reasonable for them not to communicate or meet (most commonly such cases involve patients with suicidal ideation).

Leave of Absence

Absence for urgent private reasons other than personal sickness or incapacity is at the discretion of the directors. Staff will not normally be entitled to salary in respect of periods of absence due to personal reasons, but the Committee will grant up to two days paid leave of absence to employees who require compassionate leave following the death of an immediate relative. For this purpose, immediate relatives are defined as parents, spouse, partner, children, siblings, or grandparents.

ABSENT COORDINATOR PROCEDURE:

In the event of a coordinator being absent, the deputy will assume coordinator role. If there is no deputy with a level 3 qualification available, the General Manager will assume the role. If neither the General Manager nor agency staff can fill the role, the coordinator will seek instruction from General Manager or chair person.

SUPERVISION POLICY

Introduction

It is a legal requirement (EYFS 2017) that all staff in direct contact with children receive regular supervision.

The aim of this policy is to provide a framework for the one-to-one supervision of any staff working for Starfish Kids Club who are in direct contact with children.

The policy has been written to ensure it meets the needs of the setting, the staff, and their supervisors, regardless of their job role.

The aim of supervision is to support the supervisee and to encourage reflective practice and development. It also enables the supervisee to raise any concerns.

Formal supervision is compulsory and must take place at least every term. Appraisals are annual and one-to-ones can occur more frequently as required.

The formal supervision session will provide an opportunity to look at:

- All aspects of the supervisee's roles and responsibilities in the setting
- How the supervisee's work reflects the philosophy and meets the standards expected by the setting
- The supervisee's personal and professional development needs
- The supervisee's learning and career development needs

The supervision session will also provide an opportunity for the supervisee to:

- Reflect on their experience and feelings about work in the setting
- Obtain support with any problems or difficulties
- Receive regular feedback about their performance
- Agree and review action plans linked to their job role and development needs

Supervision will always keep a focus on the best interests of the children in the setting and promote their safety and well-being.

The supervision session must:

- Be planned and the supervisee must be aware of the objectives
- Have time set aside at a time and place agreeable to the supervisor and supervisee
- Not be interrupted unless absolutely necessary.

During the sessions the content and action points of each session will be recorded by the supervisor. The supervisee will receive a copy of the supervision notes.

In the event of a supervisee wanting to have a different supervisor, they should discuss this with their existing supervisor wherever possible and then make this known to a member of the Management Team or Committee.

Promoting a safeguarding culture in the setting

- Supervision will support and strengthen the safeguarding culture we are committed to for our setting.
- Supervision will promote and model the following indicators of a safe setting:
 - Staff are respectful to all employees as well as children
 - Staff are open about discussing good and poor practice
 - Blame only occurs in extreme circumstances
 - Leaders model the appropriate behaviour

- Staff are knowledgeable about the vulnerability of the children that they look after
- Staff are aware that abusers may already be in the employment of the organisation
- Children are listened to
- Staff are empowered to challenge poor practice
- Parents are encouraged to be involved in planning their child's care and are welcomed into the setting
- Whistle-blowing procedures are in place and staff know how to use them

Supervision Policy Statement

Starfish Kids Club aims to provide appropriate, responsive, and flexible services for all the children in our care. We can only do this if our staff:

- Understand what is expected of them
- Have the skills, knowledge, behaviours, values, and attitudes necessary to carry out their role
- Are fully supported in their work and managed effectively.

Supervision is one of the ways that this can be achieved. This policy sets out how staff can expect to be supervised and provides managers with the key elements needed to supervise staff effectively.

FINANCE POLICY

Starfish is governed by a voluntary Management Committee that is registered as a company limited by guarantee. This means that the Management Committee are assumed in law to be acting as agents of the organisation and are legally and financially responsible and so can be held liable if legal or financial trouble arises.

It is therefore essential that the organisation has financial policies and procedures in place to ensure financial propriety and that its members and staff are working within legal requirements for administration of the Club.

Starfish receives most of its income in the form of fees from Parents/carers for childcare. Income is also supplemented by fundraising and occasionally by government grants.

Fees for childcare are calculated using the Brighton and Hove Local Education Authority school year calendar which shows school holidays and bank holidays. The calculations are made upon receipt of confirmation of sessions booked and Parents/carers have the choice of paying equal monthly payments by card payment or standing order or by being invoiced monthly for sessions booked. Calculation of fees is made by the General Manager and/or generated by the Magicbooking system. Starfish recognises that mistakes can be made for example, duplication of payments, overpayments, non-payment of services etc. These are all things that can be remedied as careful records are kept. If a query or concern is raised, then it will be dealt with immediately by the coordinator and/or Treasurer and if necessary financial/legal advice will be sought.

Starfish has regular expenditures such as: wages; insurances; hall hire; equipment; volunteer expenses; payment to suppliers; food; etc. It is essential that receipts are obtained and systems in place for staff members to follow. The coordinator is responsible for petty cash for day-to-day expenditure and a petty cash form is completed monthly to show the cost of each item supported by a receipt. The amount of cash still available should also be recorded and stored in a secure place. Information on all financial matters is passed onto the Treasurer to ensure accurate and up to date record of income and expenditure

PAYMENT AND NOTICE POLICY

In the Parents & Carers Handbook it clearly states the requirement for parents/carers to give one month's written notice if they wish their child/children to leave the Club, for whatever reason. By enrolling with Starfish parents/carers are agreeing to abide by the Starfish terms and conditions on the Magicbooking website, as well as the statements in the Parents & Carers Handbook.

To support the use of this rigorous system to prevent unnecessary losses. Our Procedure for late payment is:

Step One Three working days after a due payment has not been received the coordinator or Deputy will contact the parent/carer to determine reasons why. A message will be left on answerphone and an email sent if we are unable to get through requesting the parent/carer to contact us immediately.

Step Two Five working days after the due date a letter will be sent suspending the child/children's place. Receipt of letter will be taken as 2 working days after the date of posting and therefore the child/children will be excluded from the Club on the 8th working day.

Step Three Ten working days after the due date if payment has still not been received a letter and email will be sent notifying termination of child/children's place at the Club. The space will then be offered to a parent/carer on the waiting list.

The Club will recoup all lost revenue, from the date of nonattendance until the space/spaces have been reallocated, from the deposit and any monies over this amount will be sent by cheque to the parent/carer.

As always, the Committee is sensitive to difficulties parents/carers may face when paying either the deposit or fees and will endeavor to help. However, the parent/carer must contact a Committee Member before getting into arrears to arrange a personal meeting with one of the Members.

PCI DSS

Starfish Kids Club handles sensitive customer information, including card payment information, regularly. Sensitive Information must have adequate safeguards in place to protect them, to protect customer privacy, to ensure compliance with various regulations and to guard the future of the organisation.

Starfish Kids Club commits to respecting the privacy of all its customers and to protecting any data about customers from outside parties. To this end management are committed to maintaining a secure environment in which to process customer information so that we can meet these promises. Starfish Kids Club is PCI DSS compliant and as such we have a written Information Security Policy for staff which is available as from our website or to view on-site at the club.

PAYMENT RECORDS

All money, cheques, records, and receipts should be stored securely. The majority of these items are stored in a locked desk at the Starfish office, however if money is received at the afterschool club it should be locked in the file cabinet for security (prior to paying into the bank).

When payments are received, record the following details on the 'money received' form straight away:

- Parents/carers name
- whether money received is cash or cheque
- invoice number which corresponds to the payment
- what the payment is for e.g., monthly fees, travel fees, late collection, etc.

When a payment is made by cheque, ensure it has been completed satisfactorily with the correct date, amount, and signature.

If a payment is made in cash, ensure that the right change is given. A receipt may be issued upon request by the parent/carer, but receipts are not automatically issued as the systems in place provide enough record of financial transactions.

In addition to the above, sign off and date the payment received on the duplicate copy of the invoice.

PETTY CASH

Money kept by the coordinator for small day-to-day expenses is called petty cash and can be used for:

- Office/administration – printer cartridges, paper, stamps, envelopes, etc.
- Equipment and materials – pens, pencils, balls, purchases for daily activities, etc.
- Food for snack – juice, bread, fruit, biscuits, etc.
- Travel – bus tickets for staff and children to get to the Club from school.

Receipts must be obtained by members of staff for purchases and will usually be recompensed at the weekly staff meeting.

The coordinator is given cash at the beginning of each month and will complete a monthly expenses form, attaching all the receipts.

Money for larger purchases will need to be approved by the Committee if approved the General Manager will order for the club. A receipt must be obtained for the financial records and attached to the back of the cheque requisition form. Completed expenses and will be added into Pandle and then the Excel spreadsheet on a monthly basis.

STAFF WAGES

Staff hours and rates are stated in their contract. Overtime may need to be undertaken upon request of the Coordinator or Management Committee and will be paid at an hourly rate.

The staff team are currently paid to attend training courses after approval by the Committee. Evidence of the course will need to be given to a Committee Member showing a course description and times and dates of attendance, before and after the course. Certificates if available should be shown and copied for the staff file.

The timesheet is completed by the coordinator and signed by the staff. Overtime is signed off by the Treasurer before the timesheet is emailed to payroll services on each Friday afternoon. The payroll service calculates the wages, tax and national insurance and sends the pay amounts to the office. Payment is then paid into staff member's bank accounts to be cleared on the last working day of the month.

VOLUNTEER EXPENSES

Regular volunteers who give their time freely should not be out of pocket to do so. Volunteers can be reimbursed for travel costs of £5 per day for afterschool, or £20 per day for holiday club. Receipts for travel should be kept and volunteers should sign a receipt to say they have received the money. This may be done daily or as and when required.

PAYMENT TO SUPPLIERS

Suppliers provide a service to Starfish and so are paid by cheque, card, or BACS, with a suitable invoice. Services paid for include hall rent; insurances; art materials; equipment and books; etc.

AUDIT REQUIREMENTS

The administrator/assistant manager is responsible for inputting all the financial records. Figures will be made available to the Chair and Treasurer two days before a Committee Meeting.

The accounts are audited by our accountant on an annual basis before being submitted to Companies House.

COMPLAINTS, FEEDBACK AND GRIEVANCE PROCEDURE

If you wish to make a complaint about our services, it is often possible for this to be resolved informally with the coordinator at the club.

If this is not possible, you may escalate your complaint by contacting the chair of our Committee, Kevin Thomas on 07762 550036 or by making a complaint in writing to the office:

Werks, 15-17 Middle Street, Brighton BN1 1AL
info@starfishkidsclub.co.uk

The appropriate steps taken as a result of the complaint will be carried out within 28 days. You will subsequently be notified of any action taken to resolve the situation, and you will receive a copy of your complaint and the actions taken.

Individual complaints will be handled with professional discretion, although there will be times, where it will be necessary for all the staff of the club to be notified of incidents, to improve the services within the club.

All cases of complaints will be stored within the Starfish Kids Club office and will be withheld from public viewing.

If you feel that you would like to complain to our regulator, please contact OFSTED on 0300 1231231. Our OFSTED registration numbers are listed on our website www.starfishkidsclub.co.uk

If you would like to give less formal feedback on any of our services, please contact the office on 07941 525291 or email info@starfishkidsclub.co.uk

COVID-19 POLICY

Starfish Kids Club recognises that careful planning is essential in order to keep the children and our staff safe, and to limit the spread of Covid-19, within our setting.

Accordingly, we have conducted a thorough Covid-19 **risk assessment** and will review it on a monthly basis and whenever Government guidance changes.

Covid-19 symptoms

Covid-19 is a viral, respiratory disease, which is spread from person to person by close contact. Typical symptoms include new, persistent cough, high temperature and loss of (or change to) your normal sense of taste or smell (anosmia). Many people report cold or flu like symptoms, fatigue, loss of appetite and shortness of breath in addition to, or instead of the main three symptoms. However, it is important to be aware that in some cases the symptoms may be very mild or even non-existent (asymptomatic infection), especially in children and these symptoms may also have another cause.

Procedure where an individual child develops Covid-19 symptoms or has a positive test

We now understand that children who have symptoms of Covid-19 are more likely to pass the virus onto others than those who do not have any symptoms.

If a child or member of staff has suspected symptoms of Covid-19, they will be sent home and must follow the UK Health Security Agency guidance for households with Covid-19 infection.

Any child who becomes ill with symptoms which could be Covid-19 while at the Club will be isolated from the other children by at least two metres until the child can be collected by his or her parents. If the child becomes seriously ill, we will call 999.

Whilst it is no longer a legal requirement for people with Covid-19 to self-isolate, the UKHSA guidance does state that anyone who has any of the main symptoms should seek a PCR test.

If that test result is positive the guidance recommends that people with Covid-19 infection should not attend work wherever possible. Children with Covid-19 should not attend their education or childcare setting.

People with positive cases of Covid-19 should take an LFD test from five days after their symptoms started (or the day their test was taken if they did not have symptoms), followed by another one the next day (day 6). If both those test results are negative, they can return, as long as they feel well enough to do so and do not have a temperature.

For UKHSA guidance please see: <https://www.gov.uk/government/publications/covid-19-people-with-covid-19-and-their-contacts/covid-19-people-with-covid-19-and-their-contacts>

The Department for Education '*Covid-19: Actions for Out of School Settings*' guidance makes clear that Starfish Kids Club may refuse a place to a child with confirmed or suspected case of Covid-19, if we determine that this is a reasonable measure to protect other children and staff from possible infection.

Starfish Kids Club will not accept children who have tested positive Covid-19, even if they do not have symptoms.

Infection control

It is the responsibility of Starfish Kids Club to try to ensure the environment is safe for people who visit or attend. We will take reasonable steps to ensure this including regularly reviewing and updating our risk assessments.

Like the common cold and flu viruses, Covid-19 is spread by:

- **Infected people passing the virus to others through large droplets when coughing, sneezing, or even talking within a close distance.**
- Direct contact with an infected person: for example, if you shake or hold their hand, and then touch your own mouth, eyes or nose without first washing your hands.
- Touching objects (eg door handles, light switches) that have previously been touched by an infected person, then touching your own mouth, eyes or nose without first washing your hands. Viruses can survive longer on hard surfaces than on soft or absorbent surfaces.

We will take the following steps to reduce the risk of catching or spreading Covid-19 at the Club:

Hygiene:

- Staff and children will wash their hands as they arrive at the Club and will be reminded to wash their hands regularly throughout the session, especially after using the toilet, before eating food and after coughing or sneezing.
- Hand sanitiser will be available in convenient locations throughout the club.
- We will have tissues readily available for use when sneezing and coughing, and these will be disposed of, in a lidded bin, immediately after use.

Cleaning:

- We will ensure effective cleaning schedule for the club. Regular cleaning of areas and equipment will occur twice a day as a minimum.
- Frequently touched surfaces, such as handles, door plates, light switches, tabletops and toys are regularly cleaned with anti-bacterial spray or wipes, will have particular focus.

Arrivals and departures:

- We have amended our collection procedure, so parents will now collect their children from outside the Club.
- We will use technology to help with this process - parents will text or phone to inform us of their arrival or at St Andrews use the doorbell, staff will get their child ready and then take the child/ren to meet the parent.
- A member of staff will sign the children in and out, in the presence of the child's parent.

Premises

- Ventilation is important in minimising transmission of airborne viruses. Ventilation will be included as part of our risk assessment and poorly ventilated areas identified. Steps will be taken to maximise the fresh air flow in these areas, wherever practical.
- Doors and windows may be kept open where safe to do so, to keep the premises well ventilated, whilst balancing the provision of a comfortable childcare environment.

We will promote infection control through the methods above, and in addition we will:

- Ensure that all staff have received training in, and understand, our new procedures
- Display posters and information to promote infection control
- Ensure that adequate supplies of cleaning materials are available within the Club
- Dispose of waste promptly and hygienically
- Provide tissues and suitable facilities for their disposal.

Closure

We may need to temporarily close the Club if we have insufficient staff due to illness to run sessions safely. If this occurs the manager will contact UKHSA Surrey and Sussex Health Protection Team for

further support and guidance.

In the event that we have a high number of confirmed cases of Covid-19 associated with the Club, we may need to step up our measures in line with our Contingency Plan and advice received from UKHSA, Department for Education or local Health Protection Teams. This will be as a last resort given the detrimental impact on children, their families and our staff team.

If the Club needs to close, the manager will notify parents or carers as soon as possible. The manager will also inform the UKHSA Surrey and Sussex Health Protection Team as well as other relevant parties, e.g. other users of shared premises, schools etc.

This policy was adopted by: Starfish Kids Club	Date: 01/09/25
To be reviewed: 01/06/26	Signed: Charlie Wilson

Written in accordance with:

Statutory Framework for the Early Years Foundation Stage (2021): Safeguarding and Welfare Requirements: Health [3.42].

UK Health Security Agency 'Covid-19: people with Covid-19 and their contacts' 24th February 2022

Department for Education 'Covid-19: Actions for out-of-school settings' February 2022

COVID 19 OUTBREAK MANAGEMENT PLAN

This plan has been developed to ensure clarity in relation to the responsibilities and actions that will be taken should an outbreak be identified at Starfish Kids out of school/holiday club.

Notification and Activation of the Outbreak Control Plan

- 1) According to the 'Covid 19: Actions for out of school settings July 2021' guidance, if any of the Starfish Kids out of school/holiday clubs identifies "several confirmed cases within 14 days" this may constitute an outbreak.
- 2) If this situation occurs, this Outbreak Control Plan will be activated.

Management and Notification of Confirmed Cases

- 3) Where Starfish Kids Club has concerns over the level of confirmed cases within our setting, we will contact and take advice from the Department for Education via their dedicated line on 08000468687.
- 4) If DfE considers an outbreak to be taking place, they will escalate the notification to the local health protection team and advise on additional action required.
- 5) Starfish Kids Club will follow the advice of Local Authorities, local Public Health teams and PHE Health Protection Teams who will make further recommendations.

Engagement with NHS Test and Trace

- 1) Contact tracing for confirmed cases of Covid is now closed.

Reintroduction of Control Measures

- 1) If an outbreak is confirmed, Starfish Kids Club will continue to work with health protection teams to identify whether control measures need to be reactivated. These may include operating in small, consistent groups to minimise mixing and keep transmission rates low or the introduction of face coverings for adults within our operational space, where appropriate.
- 2) If an outbreak is confirmed Starfish Kids Club will prioritise enhanced cleaning protocols and hygiene measures. Any anticipated break in service for cleaning will be communicated with all parents and partners if necessary.

Standing Down

- 1) Starfish Kids Club will work closely with local Public Health officials and Local Authorities to determine when it is appropriate to stand down from additional control measures and notify all parents and partners of next steps as appropriate

Starfish Kids Club will follow the below detailed steps should an outbreak of Covid-19 be identified:

Communication to Parents and Stakeholders

The General Manager and/or Club Coordinator will contact families via telephone or email to alert them of an outbreak.

Returning to Setting Protocol

Once the child/adult has tested negative after day 5 they are able to attend the setting again.

Staff Members

If a staff member tests positive for Covid-19, we ask they do not come to work for 5 days and test negative before they return.

Completed by: **Charlie Wilson**

Date: **16/05/25**

Suggested date of review: **01/07/26**

Key contacts:

DfE Helpline - 0800 046 8687

Local PHE Team - [0344 225 3861](tel:03442253861)

LA Public Health Team - [0344 225 3861](tel:03442253861)

Key External Agencies, Services and Professionals' Contact Details:

OFSTED

Contact Ofsted by phone, email or by completing online referral form

Email: enquiries@ofsted.gov.uk

Phone: 0300 123 1231.

Brighton & Hove Children's Services

Website: [Brighton & Hove Children's Services](#)

Tel: 01273 290 400 (9am to 5pm, Monday to Thursday, and 9am to 4.30pm on Friday)

Out of hours, phone number 01273 335 905 or 01273 335 906

Front Door For Families

Website: [Front Door for Families](#)

To contact:

- send an email to FrontDoorforFamilies@brighton-hove.gov.uk.
- phone 01273 290 400 during working hours:
 - 9am to 5pm, Monday to Thursday
 - 9am to 4:30pm on Friday

Outside working hours phone the Emergency Duty Service on 01273 335 905 or 01273 335 906.

LADO

Designated Officer LADO: Name: **Kay Whitcroft**

Website: [Local Authority Designated Officer \(LADO\)](#)

Email: LADOenquiries@brighton-hove.gov.uk

Tel: 07584 217271

For urgent LADO matters outside of office hours, at weekends and on public holidays contact 01273 335905

Police Station: John Street Brighton East Sussex BN2 0LA
101 (non-emergency) or 999 (emergency)

National Police Prevent Line: 0800 011 3764, in confidence, to share your concerns with our specially trained officers.

Prevent Lead Officer in Brighton & Hove City Council or Counter Terrorism Police South East (CTPSE):

- send an email to Channel.Prevent@brighton-hove.gov.uk
- phone 01273 291 115

To contact the Prevent team at the CTPSE send an email to SussexPrevent@thamesvalley.police.uk

Anti-terrorist hotline: 0800 789 321

NSPCC: 0808 800 500