

# *Safeguarding Policy*



**2021- 2022**

## Document controls

<b>This document has been Approved for operation within:</b>	Palm Tree Nursery
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## Contents

Key safe guarding information.....	5-7
Introduction .....	7,8
Aims.....	9,10
Who is responsible for the policy?.....	9,10
Terminology .....	9,10
The Nursery's commitment .....	11,12
Role of the Management .....	12,13
Role of the Designated Safeguarding Lead(s) .....	14-16
Role of staff .....	14,16
Safeguarding information for children to build resilience, awareness and keep children safe ..	19
Safeguarding information for parents .....	20
Recognising abuse.....	21
Recognising extremism and radicalisation, mental health .....	22,23
Guidance on types of specific types of abuse.....	24,25
Child sexual exploitation .....	24,25
Female genital mutilation .....	26,27
Peer on peer abuse .....	27
Peer on peer abuse: sexual violence and sexual harassment between children in Nurseries	29,28
Peer on peer abuse: sharing nude and semi nudes.....	29,28
Faith abuse .....	30,31
Fabricated illness.....	31,32
Child criminal exploitation: countylines.....	32,32
So-called 'honour-based' violence .....	32,33
Upskirting.....	32
Online risks.....	32,33
Further information of specific safeguarding issues.....	34
Recognising children who maybe particularly vulnerable .....	34
Children who are looked after .....	34
Children with special educational needs and disabilities .....	35
Other considerations.....	34,35
Children missing from education .....	36,37
Emergency contacts for children .....	36
Dealing with safeguarding concerns and incidents .....	38
Responding to a disclosure .....	38
Responding to a concern that a child is at risk .....	39,40
Reporting safeguarding concerns .....	41-43
Record keeping.....	43-45
Record transfers.....	46,47
Access to child protection files .....	47

Retention of child protection files .....	48,49
Support for those Involved in a child protection issue .....	498
Supporting victims of abuse .....	499
Confidentiality .....	51
Safer recruitment .....	51
Allegations against members of staff .....	54,55
External speakers and charities .....	56
Use of mobile phones and cameras .....	56
Induction .....	57
Training.....	58
Extended Nursery, off-site arrangements and alternative providers .....	59
Related Nursery policies.....	59
Concerns about safeguarding practices.....	58,60
Complaints.....	59
Monitoring, evaluation and review.....	59
Appendix 1: Designated Safeguarding Lead responsibilities.....	60,61
Appendix 2: Designated LAC Teacher responsibilities.....	62-65
Appendix 3: Safeworking practices.....	66-71
Appendix 4: Safeguarding concern forms and DSL forms .....	72-79
Appendix 5: Child protection file–front sheet .....	81
Appendix 6: Removal of information record .....	82
Appendix 7: Child protection file–chronology of significant events .....	83
Appendix 8: Record of child protection file transfer .....	84
Appendix 9: Staff safeguarding declaration.....	85
Appendix 10: Safeguarding RA.....	86-90
Appendix 11: Safeguarding incident involving a member of staff and child at the nursery.....	91
Appendix 12:Safeguarding procedures Safeguarding incident involving a member of staff and child at the nursery.....	92

## Key safeguarding information

### Designated Safeguarding Leads

#### Designated Safe Guarding Lead

(also responsible for PREVENT and Well Being)

Mrs N. Hameed Rana

Email: palmtreenursery1@gmail.com

Telephone: 01254 697960

Mobile : 07903026476

Deputy Safeguarding Lead

Mrs M. Ahmed

Telephone: 01254 697960

Email: palmtreenursery1@gmail.com

### LADO/Designated Officer Referrals:

Blackburn with Darwen Safeguarding Unit,  
Ground Floor, 10 Duke Street,  
Blackburn,  
BB2 1DH  
**Tel:** 01254 585184

### Contact telephone numbers

#### Children Advice and Duty Service (CADS)

If you are concerned about the safety or welfare of a child, please phone:

Children's Social Care

**Tel:** 01254 666400

**Out of Hours:** 01254 587547

### LADO/Designated Officer Referrals:

Blackburn with Darwen Safeguarding Unit,  
Ground Floor, 10 Duke Street,  
Blackburn,  
BB2 1DH **Tel:** 01254 585184

### Review and Quality Team:

Blackburn with Darwen Safeguarding Unit,  
Ground Floor, 10 Duke Street,  
Blackburn,  
BB2 1DH  
**Email:** [CPUnit@blackburn.gov.uk](mailto:CPUnit@blackburn.gov.uk)

### Child Sexual Exploitation Team – Engage Team

**Tel:** 01254 353525

Children's Safeguarding Assurance Partnership for Blackburn with Darwen,  
Blackpool and Lancashire

Floor L, Blackburn Town Hall, King William Street,  
Blackburn,  
BB2 7DY  
Email: [Lscbinfo@blackburn.gov.uk](mailto:Lscbinfo@blackburn.gov.uk)

### Channel/Prevent

Lancashire Prevent Contacts:

If you have concerns about someone and would like more advice ring:

- Local Authority Prevent team: 01254 585 260 / email [Prevent.Team@Blackburn.gov.uk](mailto:Prevent.Team@Blackburn.gov.uk)
- Police Prevent Team: 01772 413398
- If you think a threat is imminent call the police on 999
- Alternatively contact the police confidentially on the Anti-terrorist hotline 0800 789 321.
- Report your concerns to [concern@lancashire.pnn.police.uk](mailto:concern@lancashire.pnn.police.uk).

### Local Early Help services

- If a child or young person reveals they are at risk, the practitioner should follow the local safeguarding process immediately.

#### The Team

Zoe Fitzpatrick - CAF Link Worker

Laura McKelvey - CAF Link Worker

[cafadmin@blackburn.gov.uk](mailto:cafadmin@blackburn.gov.uk)

Tel: 01254 666913/666914

### Useful Safeguarding Contacts

NSPCC **0800 800 5000**

Ofsted **0300 123 1231**

Emergency police **999**

Non-emergency police **101**

Government helpline for extremism concerns **020 7340 7264**

Child exploitation and Online protection command (CEOP)

<https://www.ceop.police.uk/safety-centre/>

### Key Documentation (including hyperlinks)

Teaching online safety in schools - GOV.UK ([www.gov.uk](http://www.gov.uk))

Inspecting safeguarding in early years, education and skills settings 2021

[Keeping Children Safe in Education \(DfE2021\)](#)

[Working Together To Safeguard Children \(DfE2018\)](#)

[What To Do If You're Worried A Child Is Being Abused \(DfE 2015\)](#)

[Child Sexual Exploitation: Definition and Guide for Practitioners](#)

[Sexting in Nurseries and Colleges: Responding to Incidents and Safeguarding Young People](#)

[Sexual violence and sexual harassment in Nurseries \(DfE2018\)](#)

<a href="#"><u>Disqualification Under the Childcare Act 2006</u></a>
<a href="#"><u>Prevent Duty Guidance for England and Wales</u></a>
<a href="#"><u>DBS Identification Checking Guidelines</u></a>
<a href="#"><u>The Use of Social Media for Online Radicalisation (HomeOffice,2015)</u></a>
<a href="#"><u>Promoting Fundamental British Values Through SMSC</u></a>
<a href="#"><u>Regulated Activity in Relation to Children (DfE2016)</u></a>
<a href="#"><u>Teacher Status Checks - Employer Access Online</u></a>
<a href="#"><u>Guidance for the Employment Of Overseas Applicants</u></a>
Guidance for the Employment of Overseas Trained Teachers
<b>Useful Sites</b>
Channel general awareness online training module
UK Safer Internet Centre
Educate Against Hate
Home Office PREVENT e-learning
Home Office FGM e-learning
Think u Know
Disrespect Nobody
<a href="#"><u>Mental health and behaviour in schools - GOV.UK (www.gov.uk)</u></a>
<a href="https://www.nspcc.org.uk/about-us/news-opinion/2021/sexual-abuse-victims-schools-"><u>https://www.nspcc.org.uk/about-us/news-opinion/2021/sexual-abuse-victims-schools-</u></a>

## Introduction

1. Palm Tree Nursery recognizes its moral and statutory responsibility to safeguard and promote the welfare of all children. We endeavor to provide a safe and welcoming environment in all our Nurseries where children are respected and valued.
2. This policy is written with regard to:
  - a. Department for Education (DfE) guidance “Keeping Children Safe in Education” issued in 2021;
  - b. Home Office guidance “Channel: Protecting Vulnerable People from Being Drawn into Terrorism” issued in 2015;
  - c. Home Office guidance “Prevent Duty Guidance in England and Wales” issued in 2015 and the associated “The Prevent Duty: Departmental advice for Nurseries and childcare providers” subsequently issued by DfE in 2015;
  - d. Home Office guidance “Channel: Vulnerability Assessment Framework” issued in 2012;
  - e. DfE guidance “Working Together to Safeguard Children” issued in 2018;
  - f. DfE guidance “What To Do If You’re Worried A Child Is Being Abused” issued in 2015;
  - g. DfE guidance “Disqualification Under the Childcare Act 2006” issued in 2015.

### Legal framework and definition of safeguarding

- Children Act 1989 and 2004
- Childcare Act 2006 (amended 2018)
- Safeguarding Vulnerable Groups Act 2006
- Children and Social Work Act 2017
- The Statutory Framework for the Early Years Foundation Stage (EYFS) 2021
- Working Together to Safeguard Children 2018
- Keeping Children Safe in Education 2021

- Data Protection Act 2018
- What to do if you're worried a child is being abused 2015
- Counter-Terrorism and Security Act 2015.
- Inspecting Safeguarding in Early years, Education and Skills settings 2021
- Prevent Duty 2015

3. It applies to all teaching, non-teaching and volunteer members of staff.

4. Section 157 of the Education Act 2002 and the Education (Independent Nurseries Standards) (England) Regulations 2003 require proprietors of independent Nurseries (including academies and city technology colleges) to have arrangements to safeguard and promote the welfare of children. In line with this requirement, Palm Tree Nursery has systems in place which are designed to:

- prevent unsuitable people working with, or coming into contact with children within Nursery;
- promote safe practice and challenge poor or unsafe practice;
- identify children who are suffering or likely to suffer significant harm and take appropriate action with the aim of making sure they are kept safe both at home and at Nursery;
- identify children who may be susceptible to messages of violence and radicalisation and take appropriate action to ensure early intervention challenges extreme ideologies and diverts young people from the risk they face before illegality occurs;
- contribute to effective partnership working between all those involved with providing services for children.

5. There are three main elements to the Safeguarding (Child Protection) Policy:

- prevention – a commitment to early help and identification of unmet needs and vulnerabilities and partnerships with agencies to promote the welfare of children and keep children safe;
- protection- all staff and volunteers are trained to recognise and respond to abuse and neglect and are expected to be vigilant and act quickly when they suspect a child is suffering, or is likely to suffer, harm (in line with the Safeguarding Partners procedures);
- support– recognition of the sensitivity and complex nature of safeguarding and child protection, ensuring that children, staff and families are supported appropriately.

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<sup>1</sup>Significant harm can be defined as 'the ill-treatment or impairment of health and development of a child or young person' where:  
 Development includes physical, intellectual, emotional, social or behavioral development  
 Health includes physical and mental health ill-treatment includes sexual abuse and other forms of ill-treatment which are not physical.



## Aims

6. To ensure that all practices of a Nursery and its stakeholders contribute towards the safeguarding and promoting of the welfare of all of our young people – the children's welfare is of paramount importance.
7. To emphasise how the safe guarding and promoting of the welfare of all of our children is the primary responsibility of all staff, volunteers and management.
8. To detail the procedures to follow to ensure the safe recruitment of staff, governors and volunteers to a Nursery.
9. To outline the safe working practices that all staff, management and volunteers should undertake when working with children at the Nursery.
10. To communicate clear procedures for identifying, reporting and recording suspected cases of abuse, extremism and radicalisation.
11. To support the mission, vision and values of the Management.

## Who is responsible for the policy?

12. The Management has overall responsibility for the development and effective operation of this policy.
13. The Management has delegated day-to-day responsibility for operating the policy at the Nursery.
14. The Management has a specific responsibility to ensure the fair application of this policy and all are responsible for supporting colleagues and ensuring its success.
15. This policy must be implemented alongside the procedural guidance set out by the Local Authority.

## Terminology

16. **Safeguarding and promoting the welfare of children** is defined for the purposes of this policy as: protecting children from maltreatment; preventing impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes (Keeping Children Safe in Education, DfE, 2021).
  - Children includes everyone under the age of 18.
17. **Child protection** refers to the processes undertaken to protect children who have been identified as suffering or being at risk of suffering significant harm (Children Act 1989).

18. **Child in Need** refers to a child that is unlikely to achieve or maintain, or to have the opportunity of achieving or maintaining, a reasonable standard of health or development without the provision of services by a local authority (Children Act 1989).
19. **Early help** means providing support as soon as a problem emerges at any point in a child's life.

20. It relates to those children and young people at risk of harm (but who have not yet reached the "significant harm" threshold and for whom a preventative service would reduce the likelihood of that risk or harm escalating). Early help requires a collaborative approach from all agencies, including Nurseries, with the active involvement of children, young people, families and carers. Any child may benefit from early help, but all Nursery and college staff should be particularly alert to the potential need for early help for a child who:

1. **Early Help:** Any child may benefit from early help, but all staff should be particularly alert to the potential need for early help for a child who:
  - is disabled and has specific additional needs
  - has special educational needs (whether or not they have a statutory education, health and care plan)
  - has a mental health need
  - is a young carer
  - is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
  - is showing signs of harmful sexual behaviours
  - is frequently missing/goes missing from care or from home
  - is at risk of modern slavery, trafficking, sexual or criminal exploitation
  - is at risk of being radicalised or exploited
  - has a family member in prison, or is affected by parental offending
  - is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
  - is misusing drugs or alcohol themselves
  - has returned home to their family from care
  - is at risk of honour-based abuse such as female genital mutilation (FGM) or forced marriage
  - absent from education (Keeping children safe in education, DfE, 2021)

21. **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups (Keeping Children Safe in Education, DfE, 2021).

22. **Extremism** is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas (Prevent

Strategy, Home Office, 2011).

23. **Non-violent extremism** is extremism, as defined above, which is not accompanied by violence  
(Prevent Duty Guidance, Home Office, 2015).
24. The current UK definition of '**terrorism**' is given in the Terrorism Act 2000 (TACT 2000). In summary, this defines terrorism as an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause (Prevent Duty Guidance, Home Office, 2015).
25. An **ideology** is a set of beliefs (Prevent Strategy, Home Office, 2011).
26. **Female Genital Mutilation** (FGM) is a procedure involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse (Keeping Children Safe in Education, DfE, 2021).
27. **Staff** refers to all those working for or on behalf of the Nursery, full time or part time, in either a paid or voluntary capacity.
28. **Child** refers to all young people who have not yet reached their 18th birthday.
29. **Parent** refers to birth parents and other adults who are in a parenting role, for example step- parents, foster carers and adoptive parents or legal guardian(s).
30. **Upskirting** refers to the act of taking a picture or video under another person's clothing, without their knowledge or consent, with the intention of viewing that person's genitals or buttocks (with or without clothing). Despite the name, anyone (including both pupils and teachers), and any gender, can be a victim of upskirting.

## The Nursery's commitment

31. Everyone who comes into contact with children and their families has a role to play in safeguarding children. Nursery staff are particularly important as they are in a position to identify concerns early and provide help for children, to prevent concerns from escalating.
32. The Management is committed to providing safe, caring and welcoming environments where every child is able to reach their full potential free from harm, abuse and discrimination. All staff and volunteers are expected to discharge their safeguarding responsibilities effectively and recognise that high self-esteem, confidence, peer support and clear lines of communication with Management ed adults helps all children, especially those at risk of or suffering abuse, to thrive.

33. The Management is alert to the signs of abuse, neglect and radicalisation and follow procedures to ensure that children receive effective support, protection and justice.
34. The Management will work with social care, the police, health services and other services (such as Channel co-ordinators / Police Practitioners where appropriate) to promote the welfare of children and protect them from harm.

## **Role of the Management at the nursery**

35. The Management at the Nursery is expected to:

- a. monitor the Nursery's compliance with the Safeguarding (Child Protection) Policy and ensure that it is provided to and read by all staff – including temporary staff and volunteers on induction;
- b. ensure all staff read at least Part1 of Keeping Children Safe in Education (DfE 2021);
- c. have a lead person for safeguarding and child protection on the Management who liaises with the team, Local Authority and/or partner agencies on these matters;
- d. ensure that the Nursery contributes to inter-agency working in line with the statutory guidance Working Together to Safeguard Children (DfE,2021) including providing a coordinated offer of early help when additional needs are identified, contributing to inter- agency plans to provide additional support to children subject to child protection plans and allowing the Local Authority to conduct a section 17 or section 47 assessment;
- e. recognise the importance of information sharing between professionals.
- f. Ensure that Nursery systems and procedures take into account the procedures and practice of the Local Authority as part of the inter-agency safeguarding procedures setup by the Safeguarding Partners;
- g. verify that the Nursery operates safer recruitment procedures and fulfills its statutory duty to ensure that appropriate checks are carried out on all staff and volunteers at the Nursery;
- h. ensure that the Nursery has clear steps for dealing with allegations of abuse against members of staff and volunteers that comply with locally agreed guidance and role
- i. ensure that a member of the Management team is nominated to liaise with the Local Authority and partner agencies in the event of an allegation being made against the Headteacher/ Manager;
- j. ensure the Staff Code of Conduct is upheld and provided to all staff including temporary members of staff;
- k. ensure that a senior leader(s) (Designated Safeguarding Lead) in the Nursery is designated with lead responsibility for dealing with child protection issues who will provide support to staff members to carry out their safeguarding duties and liaise closely with other services such as Children's Social Care and where appropriate Channel coordinators / Police Practitioners;
- l. ensure that the Designated Safeguarding Lead(s)within Nursery have regular training from the Safeguarding Partners;

- m. ensure that a senior leader in the Nursery is designated to promote the educational achievement of children who are looked after and to ensure that this person has appropriate training;
- n. ensure the Nursery, in the exercise of its function, fulfills its duty to have “due regard to the need to prevent people from being drawn into terrorism”;
- o. ensure that the Designated Safeguarding Lead(s) receives regular training from appropriate agencies with regard to the Prevent Agenda and raising awareness and vigilance to reduce extremism and protect vulnerable people from radicalisation;
- p. ensure there are procedures in place to make a referral to the Disclosure and Barring Service if a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have been had they not resigned (this is a legal duty and failure to refer when the criteria is met is a criminal offence);
- q. ensure all staff receive induction training, regular updates on child protection issues and annual safeguarding training on child protection issues;
- r. ensure that staff have the skills, knowledge and understanding necessary to keeping looked after children safe through provision of training on child protection issues;
- s. ensure appropriate safeguarding procedures and responses are in place for children who go missing in education;
- t. ensure there are procedures in place to handle allegations against other children;
- u. ensure there is a clear accountability for the commissioning and/or provision of the services designed to safeguard and promote the welfare of children;
- v. ensure Nursery staff fulfill their statutory duty to report to the police any discovery that
- w. Female Genital Mutilation appears to have been carried out on a girl under 18;
- x. where services or activities are provided on the Nursery premises by another body, ensure the body concerned has the appropriate policies and procedures in place in regard to safeguarding children and child protection and liaises with the Nursery on these matters where appropriate;
- y. ensure it considers how children may be taught about safeguarding, including online, through teaching and learning opportunities, as part of providing a broad and balanced curriculum.
- z. ensure the Nursery has appropriate filters and monitoring in place to ensure children are safeguarded from potentially harmful and inappropriate online material;
- aa. ensure all systems within Nursery have the child’s best interest at heart.

## Role of the Management Team

36. The management team is expected to:

- a. Ensure that the Safeguarding (Child Protection) Policy and procedures are implemented and followed by all staff;
- b. Ensure the Designated Safeguarding Lead(s) is given the time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings—and/or to support other staff to do so—and to contribute to the assessment of children;
- c. Ensure all staff receive induction training, regular updates on child protection issues and annual safeguarding training on child protection issues;
- d. Ensure within the management team there is a suitable person who will liaise with the Local Authority Designated Officer (LADO) in the event of allegations of abuse being made against a member of staff or volunteer;
- e. Ensure that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistle blowing procedures;
- f. Ensure that children's safety and welfare is addressed through the curriculum;
- g. Ensure appropriate arrangements are in place to ensure staff fulfill their statutory duty to report to the police any discovery that Female Genital Mutilation appears to have been carried out on a girl under 18;
- h. Ensure the Nursery has arrangements in place to fulfill its duty to have "due regard to the need to prevent people from being drawn into terrorism";
- i. Ensure the Nursery has arrangements in place to monitor and respond to children who go missing from education;
- j. Ensure the Nursery fulfills its responsibility to complete the Audit in liaison with the Safeguarding Partners;
- k. Ensure the Nursery fulfills its responsibility to complete a PREVENT Risk Assessment;

## Role of the Designated Safeguarding Lead(s)

37. The Designated Safeguarding Lead will be a member of the Management Team and their responsibilities will be set out in their Job Description (see Appendix 1).

38. All safeguarding concerns, suspicions and disclosures are reported to the Nursery's Designated Safeguarding Lead for Safeguarding and Child Protection.

39. The Designated Safeguarding Lead will:

- a. Have a working knowledge of how the Local Authority conducts a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;

- b. Ensure each member of staff has access to and understands the Safeguarding (Child Protection) Policy and procedures and has read at least Part1 of Keeping Children Safe in Education (DfE, 2021), especially new and part time staff;
- c. Ensure all staff receive induction training, regular updates on child protection issues and annual safeguarding training on child protection issues;
- d. Be alert to the specific requirements of children in need, those with Special Educational Needs and young carers;
- e. keep detailed, accurate, secure written records of concerns and referrals;
- f. encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the Nursery may put in place to protect them;
- g. work with the Management team in the annual review of the Safeguarding (Child Protection) Policy and procedures;
- h. ensure the Safeguarding (Child Protection) Policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the Nursery in this;
- i. complete the Safeguarding Audit;
- j. complete an annual PREVENT Risk Assessment;
- k. link with appropriate outside agencies to ensure staff receive training on the Prevent Agenda, and the means by which to identify extremism and prevent radicalisation and what to do to support them;
- l. understand the Channel Panel referral system;
- m. ensure the Nursery Single Central Record is maintained and up-to-date;
- n. keep a record of staff attendance at safeguarding and child protection training;
- o. consider whether it is appropriate to share any information with the new Nursery in advance of a child leaving, in addition to the child protection file. Keeping Children Safe in Education, DfE 2021, gives the example of information that would allow the new Nursery to continue supporting a victim of abuse and have the appropriate support in place for the child's arrival;
- p. where children leave the Nursery, ensure their child protection file is copied for any new Nursery as soon as possible but transferred separately from the main child file, ensuring secure transit and confirmation of receipt is obtained;
- q. understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments;
- r. take the lead with Early Help support where appropriate (Keeping Children Safe in Education, DfE, 2021);
- s. Ensure Nursery staff are aware of their statutory duty to report to the police any discovery that Female Genital Mutilation appears to have been carried out on a girl under 18.

40. In managing referrals, the Designated Safeguarding Lead will:

- a. Refer all cases of suspected abuse to the Local Authority Children's Social Care team and:
- b. the Local Authority Designated Officer (LADO) for child protection concerns (all cases which concern a staff member);



- c. Disclosure and Barring Service (cases where a person is dismissed or left due to risk/harm to a child);
  - d. Police (cases where a crime may have been committed).
  - e. liaise with the Manager to inform them of issues, especially on-going enquiries under section 47 of the Children Act 1989 and police investigations;
  - f. act as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies.
41. The Designated Safeguarding Lead is also the Designated Teacher with responsibilities for promoting the educational achievement of children who are looked after and is expected to undertake appropriate training.
42. At least one Deputy Designated Safeguarding Lead will be identified in the Nursery and trained to the same standard as the Designated Safeguarding Lead. The Designated Safeguarding Lead will, however, take lead responsibility as set out in Appendix 2.
43. During term time, the Designated Safeguarding Lead and/or Deputy Designated Safeguarding Lead will always be available (during Nursery time) for staff to discuss safeguarding concerns. Appropriate cover will also be put in place to cover out of hours/out of term time activities.

## Role of staff

All staff must be aware that safeguarding issues can manifest themselves via peer on peer abuse. This is most likely to include, but may not be limited to:

- bullying (including cyberbullying)
  - physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
  - sexual violence, such as rape, assault by penetration and sexual assault
  - sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse
  - upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
  - sexting (also known as youth produced sexual imagery)
  - initiation/hazing type violence and rituals
  - be clear as to the Nursery's policy and procedures with regards to peer-on-peer abuse (Keeping children safe in education, DfE, 2021)
44. All staff have a responsibility to provide a safe environment in which to learn.
45. All staff have a responsibility to identify children who may benefit from early help, who are suffering, or are likely to suffer, significant harm or who express extremist



ideologies and are thus vulnerable to radicalisation and to take appropriate action, working with other services as needed.

46. All staff are expected to:

- a. read at least part one of the DfE guidance document 'Keeping Children Safe in Education' 2021;
- b. be aware of systems within the Nursery which support safeguarding (e.g. Safeguarding Policy, Staff Code of Conduct, identity and role of the Designated Safeguarding Lead) and how to report safeguarding concerns;
- c. be aware of the early help process and understand their role in it, including liaising with the Designated Safeguarding Lead, sharing information and in some cases acting as the lead professional. The following indicators help staff recognise the potential need for early help:
- d. the child is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
- e. the child is at risk of modern slavery, trafficking or exploitation;
- f. the child is showing early signs of abuse and/or neglect;
- g. the child is at risk of being radicalised or exploited;
- h. the child is a privately fostered child (Keeping Children Safe in Education, DfE, 2021)
- i. be aware of the process for making referrals to Children's Social Care and for statutory assessments that may follow a referral, along with the role they might be expected to play in such assessments;
- j. be familiar with, and implement, safe working practices outlined in this policy (see
- k. Appendix 3) and other Nursery procedures;
- l. Be familiar with and alert to the key indicators of abuse neglect and vulnerability to radicalisation;
- m. Ensure that they take all reasonable steps to minimise the risk of harm to young people at the Nursery and home;
- n. Ensure they take all reasonable steps to challenge extremist ideologies;
- o. contribute to a supportive culture where young people are able to report concerns;
- p. involve the appropriate member/s of staff when a child informs them that he/she is being abused (Keeping Children Safe in Education, DfE, 2021);
- q. report any abuse, suspected abuse or concerns regarding extremism/radicalisation to the Designated Safeguarding Lead(s) immediately and, where required, support social workers to take decisions about individual children;
- r. report any concerns regarding the behaviour of an adult working at the Nursery to the Manager and if the concern is regarding the Manager, then report this to the Head teacher;
- s. under take annual safeguarding and child protection training;
- t. maintain an attitude of 'it could happen' here;
- u. promote fundamental British values, including democracy, the rule of law, individual liberty, freedom of speech, freedom of thought, freedom of association and mutual respect and tolerance of different faiths and beliefs;

- v. liaise with the Designated Safeguarding Lead to report to the police any discovery that Female Genital Mutilation appears to have been carried out on a girl under 18, discuss any concerns with the DSL relating to possible indicators that a child may be vulnerable to Female Genital Mutilation;
- w. be aware that safeguarding issues can manifest themselves via peer on peer abuse. This is most likely to include, but may not be limited to:
  - x. bullying (including cyber bullying); physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
  - y. sexual violence and sexual harassment;
  - z. sexting (also known as youth produced sexual imagery);
  - aa. initiation/hazing type violence and rituals;
  - bb. be clear as to the Nursery's policy and procedures with regards to peer on peer abuse (Keeping Children Safe in Education, DfE, 2021).

### Role of the Safeguarding Team

47. The, Safeguarding Team will play an important role in safeguarding and promoting the welfare of children in the Nursery. The aim of the Safeguarding Team is to;  
Enhance the Nursery's provision for the safeguarding and promotion of the welfare of:
- a. learners;
  - b. provide a comprehensive Child Support Package that will allow the Nursery to put into place support measures which are fully inclusive and wide ranging;
  - c. ensure that pastoral support to learners is personalised and responsive to need;
  - d. ensure that learners with personalised pastoral needs make good to outstanding academic progress in line with their peers in Nursery;
  - e. ensure that external support is sought where relevant and appropriate for particular children with complex pastoral needs or who are from 'vulnerable groups'.
48. The Safeguarding Team will maintain a risk register of vulnerable children who require sustained pastoral support. Children will be assessed against criteria for referral based on the Local Authority's 'continuum of need and response' and guidance related to extremism and radicalisation as part of the Prevent Agenda.
49. The risk register will place all learners in the Nursery into one of five categories:
- Category 1** – Learners who have no discernible pastoral needs, or have needs which are met through general provision in the Nursery. This group will not be addressed by the Safeguarding Team.
- Category 2** – Learners who have a discernible pastoral need, but there is a low risk and impact of  
harm to development and the need is being addressed through a single strategy or response (e.g. a child with Special Educational Needs). This group will not be addressed by the Safeguarding Team.
- Category 3** – Learners who have several or complex discernible needs, and there is a moderate risk and impact of harm to their development. The need is being met through multiple approaches and strategies (e.g. a child who is experiencing

bereavement and going through a stressful time but is receiving mentoring and targeted support in lessons). The Safeguarding Team will briefly discuss provision for each learner in this category.

**Category 4** – Learners who have several or complex discernible needs, and there is a moderate risk of harm to their development. The need requires a multi-faceted approach, but remains inadequately addressed as yet. Examples include the same as that for Category 3, but without the adequate provision in place (e.g. a child who is self-harming). The Safeguarding Team will discuss, agree and review provision for each learner in this category.

**Category 5** – Learners who have a significant need or are most immediately vulnerable, where there is a substantial and immediate risk and impact of harm to their development, where the learner has experienced significant harm or where they are at risk of causing harm to others. The need requires urgent and significant multi-agency support, including external provision (e.g. a child who is being abused or at immediate risk of being abused, a child who discusses causing harm to members of the armed forces). The Safeguarding Team will discuss, agree and review provision for each learner in this category.

50. The Safeguarding Team will meet half-termly to agree and then review strategies for children placed in groups 3, 4 and 5.

## **Safeguarding information for children to build resilience, awareness and keep children safe**

51. The Nursery recognises that high self-esteem, confidence, supportive friends and clear lines of communication with Management helps all children, and especially those at risk of, or suffering from, abuse.
52. The Nursery will therefore:
- a. establish and maintain an ethos where children feel secure and are encouraged to talk, and are listened to;
  - b. ensure that children know that there are adults in the Nursery who they can approach if they are worried or are in difficulty;
  - c. ensure children are aware of the Safeguarding (Child Protection) Policy and the Designated Safeguarding Lead(s);
  - d. provide a broad and balanced curriculum which promotes the spiritual, moral, cultural, mental and physical development of young people;
  - e. include activities and opportunities which equip children with the skills they need to stay safe from abuse (including recognising and managing risk, resisting pressures, healthy relationships) and which will help them develop realistic attitudes to the responsibilities of adult life, particularly with regard to childcare and parenting skills;
  - f. embed opportunities for children to learn right from wrong, mix and share with children and value others' views, know about similarities and differences between themselves and others, and challenge negative attitudes and stereotypes;

- g. promote community cohesion through partnership work and community service activities;
- h. ensure it has appropriate online filters and monitoring systems in place;
- i. develop and deliver a curriculum to safeguard children online, including information on the ways in which social media is used to radicalise young people;
- j. implement systems to ensure children are safe from terrorist and extremist material when accessing the internet in Nursery, including establishing appropriate levels of filtering;
- k. embed the fundamental British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs in the Nursery curriculum and all activities in and out of Nursery;
- l. ensure that, wherever possible, every effort is made to establish effective working relationships with parents and colleagues from other agencies;
- m. make arrangements for consulting with and listening to children through the Child Council, displays and suggestion boxes to ensure children and young people have safe spaces to discuss sensitive topics including terrorism and extremist ideologies.

## Safeguarding information for parents

- 53. The Nursery will ensure the Safeguarding (Child Protection) Policy is available publicly via the Nursery website and parents are aware of the fact that referrals about suspected abuse or neglect and vulnerability to radicalisation may be made and the role of the Nursery in this.
- 54. Parents will be expected to support the Nursery's ethos and the Safeguarding (Child Protection) Policy by demonstrating mutual respect and tolerance for all, promoting fundamental British values and rejecting all forms of discrimination and extremism.

## Recognising abuse

- 55. Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. A child may be abused in a family or institutional setting or community setting by those known to them, or more rarely by others. They may be abused by an adult or adults or another child or children.
- 56. Abuse can take many forms. Abuse, safeguarding issues and neglect are rarely standalone events that can be covered by one definition or label. Knowing what to look for is vital to the early identification of abuse and neglect. If a staff member is unsure, they must always speak to the Designated Safeguarding Lead.
- 57. **Physical abuse:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child. Possible signs of physical abuse include:
  - a. any injuries not consistent with the explanation given for them;

- b. injuries which occur to the body in places which are not normally exposed to falls or rough games;
- c. injuries which have not received medical attention;
- d. reluctance to change for, or participate in, games or swimming;
- e. bruises, bites, burns and fractures, for example, which do not have an accidental explanation;
- f. inconsistent accounts for the cause of injuries.

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

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

- a. depression, aggression, extreme anxiety, changes or regression in mood or behaviour, particularly where a child withdraws or becomes clingy;
- b. obsessions or phobias;
- c. sudden underachievement or lack of concentration;
- d. seeking adult attention and not mixing well with other children;
- e. sleep or speech disorders;
- f. negative statements about self;
- g. highly aggressive or cruel to others;
- h. extreme shyness or passivity;
- i. running away, stealing and lying.

59. **Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. Possible signs of sexual abuse include:

- a. the child has an excessive preoccupation with sexual matters and inappropriate knowledge of adult sexual behaviour for their age, or regularly

- engages in sexual play inappropriate for their age;
- b. sexual activity through words, play or drawing;
- c. repeated urinary infections or unexplained stomach pains;
- d. the child is sexually provocative or seductive with adults;
- e. inappropriate bed-sharing arrangements at home;
- f. severe sleep disturbances with fears, phobias, vivid dreams or nightmares which sometimes have overt or veiled sexual connotations;
- g. eating disorders such as anorexia or bulimia.

60. **Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs. Possible signs of neglect include:

- a. Dirty skin, body smells, unwashed, uncombed hair and untreated lice;
- b. clothing that is dirty, too big or small, or inappropriate for weather conditions;
- c. frequently left unsupervised or alone;
- d. frequent diarrhoea;
- e. frequent tiredness;
- f. untreated illnesses, infected cuts or physical complaints which the carer does not respond to;
- g. frequently hungry;
- h. over eating junk food.

## Recognising extremism and radicalisation

61. Section 26 of the Counter-Terrorism and Security Act 2015 places a duty on the Nursery to have "due regard to the need to prevent people from being drawn into terrorism". 'Having due regard' means that the Nursery should place an appropriate amount of weight on the need to prevent people being drawn into terrorism when they consider all the other factors relevant to how they carry out their usual functions. Being drawn into terrorism includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit.

62. The following guidance provides examples of potential indicators for assessing an individual's vulnerability to being drawn in terrorism. The examples are not exhaustive, and vulnerability may manifest itself in other ways; there is not simple profile. The guidance is written with regard to the Home Office guidance "Channel: Protecting Vulnerable People from Being Drawn into Terrorism"(2015) and "Channel: Vulnerability Assessment Framework"(2012).

63. Engagement: Example needs, susceptibilities, motivations and contextual influences that make individuals vulnerable to engagement with an extremist group, cause or

ideology include:

- a. feelings of grievance and injustice;
- b. feeling under threat;
- c. a need for identity, meaning and belonging;
- d. a desire for status;
- e. a desire for excitement and adventure;
- f. a need to dominate and control other;
- g. susceptibility to indoctrination;
- h. a desire for political or moral change;
- i. opportunistic involvement;
- j. family or friends' involvement in extremism;
- k. being at a transitional time of life;
- l. being influenced or controlled by a group;
- m. relevant mental health issues.

## Mental Health

Mental health problems can affect many of our young people. These include depression, anxiety and conduct disorder and self-harm and often have a direct response to what is happening in their lives. Such problems also be indicators that a child has suffered or is at risk of suffering abuse, neglect or exploitation. If staff have a concern about a child's mental health that is also a safeguarding concern, then immediate action should be taken. Palm Tree Nursery Well Being co-ordinator is Mrs N. Hameed.

64. Example indicators that an individual is engaged with an extremist group, cause or ideology include:

- a. spending increasing time in the company of other suspected extremists;
- b. changing their style of dress or personal appearance to accord with the group;
- c. their day-to-day behaviour becoming increasingly centred around an extremist ideology, group or cause;
- d. loss of interest in other friends and activities not associated with the extremist ideology, group or cause;
- e. possession of material or symbols associated with an extremist cause(e.g. the swastika for far right groups);
- f. attempts to recruit others to the group/cause/ideology;
- g. communications with others that suggest identification with a group/cause/ideology.
- h. Intent to cause harm: Not all those who become engaged by a group, cause or ideology go on to develop an intention to cause harm, so this dimension is considered separately. Intent factors describe the mindset that is associated with a readiness to use violence and address what the individual would do and to what end. They can include:
  - i. over-identification with a group or ideology;
  - j. 'Them and Us' thinking;
  - k. dehumanisation of the enemy;
  - l. attitudes that justify offending;
  - m. harmful means to an end;



n. harmful objectives.

65. Example indicators that an individual has an intention to use violence or other illegal means include:

- a. Clearly identifying another group as threatening what they stand for and blaming that group for all social or political ills;
- b. using insulting or derogatory names or labels for another group;
- c. speaking about the imminence of harm from the other group and the importance of action now;
- d. expressing attitudes that justify offending on behalf of the group, cause or ideology;
- e. condoning or supporting violence or harm towards others;
- f. plotting or conspiring with others.

66. Capability to cause harm: Not all those who have a wish to cause harm on behalf of a group, cause or ideology are capable of doing so, and plots to cause widespread damage take a high level of personal capability, resources and networking to be successful. What the individual is capable of is therefore a key consideration when assessing risk of harm to the public. Example indicators that an individual is capable of directly or indirectly causing harm include:

- a. having a history of violence;
- b. being criminally versatile and using criminal networks to support extremist goals;
- c. having occupational skills that can enable acts of terrorism (such as civil engineering, pharmacology or construction);
- d. having technical expertise that can be deployed (e.g. IT skills, knowledge of chemicals, military training or survival skills).

## Guidance on types of specific types of abuse

### Child sexual exploitation

67. Child sexual exploitation (CSE) is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology (DfE, 2017).

68. Child sexual exploitation is never the victim's fault, even if there is some form of exchange: all children and young people under the age of 18 have a right to be safe and should be protected from harm.

69. Possible signs of child exploitation include:

- a. acquisition of money, clothes, mobile phones etc without plausible explanation;
- b. gang-association and/or isolation from peers/social networks;



- c. Exclusion or unexplained absences from the Nursery;
- d. leaving home/care without explanation and persistently going missing or returning late;
- e. excessive receipt of texts/phone calls;
- f. returning home under the influence of drugs/alcohol;
- g. inappropriate sexualised behaviour for age/sexually transmitted infections;
- h. evidence of/suspicious of physical or sexual assault;
- i. relationships with controlling or significantly older individuals or groups;
- j. multiple callers (unknown adults or peers);
- k. frequenting areas known for sex work;
- l. concerning use of internet or other social media;
- m. increasing secretiveness around behaviours; and
- n. self-harm or significant changes in emotional well-being.

70. Appropriate action, recording, referring and support will be put in place in line with the usual safeguarding procedures.

71. All responses will pay regard to the DfE advice 'Child sexual exploitation - Definition and a guide for practitioners, local leaders and decision makers working to protect children from child sexual exploitation'.

## Female genital mutilation

72. Female Genital Mutilation (FGM) comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

73. The Nursery is alert to the possibility of a girl being at risk of FGM, or already having suffered FGM.

74. Signs FGM may be imminent include:

- a. it maybe possible that families will practise FGM in the UK when a female family elder is around, particularly when she is visiting from a country of origin;
- b. a professional may hear reference to FGM in conversation, for example a girl may tell other children about it;
- c. a girl may confide that she is to have a 'special procedure' or to attend a special occasion to 'become a woman';
- d. a girl may request help from a teacher or another adult if she is aware or suspects that she is at immediate risk;
- e. parents seeking to withdraw their children from learning about FGM.

75. There are a number of indications that a girl or woman has already been subjected to FGM:

- a. a girl or woman may have difficulty walking, sitting or standing and may even look uncomfortable;
- b. a girl or woman may spend longer than normal in the bathroom or toilet due to difficulties urinating;

- c. a girl may spend long periods of time away from a classroom during the day with bladder or menstrual problems.
- d. a girl or woman may have frequent urinary, menstrual or stomach problems;
- e. there may be prolonged or repeated absences from the Nursery;
- f. a prolonged absence from the Nursery with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return;
- g. a girl or woman may be particularly reluctant to undergo normal medical examinations;
- h. a girl or woman may confide in a professional;
- i. a girl or woman may ask for help, but may not be explicit about the problem due to embarrassment or fear;
- j. a girl may talk about pain or discomfort between her legs.

76. Where staff have a concern, the Nursery will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care.

77. In line with Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015), the Nursery and its staff will fulfil the statutory duty to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18.

78. Appropriate action, recording, referring and support will be put in place in line with the usual safeguarding procedures.

79. Where staff have a concern, the nursery will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care.

## Peer on peer abuse

The Management at nursery takes peer on peer abuse seriously and all staff are clear that peer on peer abuse should not be passed off as 'part of growing up' or 'banter'. The nursery has a zero-tolerance approach to peer and peer abuse.

Nursery has put in place safeguards to reduce the likelihood of peer-on-peer allegations as outlined in this document and is alert to the indicators of abuse.

Incidents of peer-on-peer abuse will be dealt in line with the normal nursery safeguarding procedures.

80. Children may be harmed by other children. Staff will be aware of the harm caused by bullying and will use the Nursery's anti-bullying procedures where necessary. However, there will be occasions when a child's behaviour warrants a response under child protection rather than anti-bullying procedures.

81. Peer-on-peer abuse can include: bullying, sexual bullying at Nursery; being coerced to send sexual images; physical and sexual assaults and violence; child sexual exploitation and teenage relationship abuse. Gang-affected young

women are particularly vulnerable to being sexually exploited for protection, status, drugs or money.

82. The Nursery takes peer on peer abuse seriously and all staff are clear that peer on peer abuse should not be passed off as “part of growing up” or “banter”.
83. The Nursery has put in place safeguards to reduce the likelihood of peer on peer allegations as outlined in this policy and is alert to the indicators of abuse.
84. Incidents of peer on peer abuse will be dealt in line with the normal Nursery safeguarding procedures.
85. In dealing with peer on peer abuse, the Nursery recognises:
  - a. that peer on peer abuse often occurs in the same Nursery or neighbourhood, thus it is important any response takes account of how a network of peer relationships is affected;
  - b. the relationship between sexual exploitation, serious youth violence, and teenage relationship abuse, and the need to ensure it is recognised when young people are experiencing multiple forms of abuse;
  - c. that young people who have experienced abuse and exploitation can also be groomed to abuse their peers, requiring a much more holistic approach to safeguarding;
  - d. that different gender issues can be prevalent;
  - e. that peer on peer abuse can be influenced by the nature of the environments in which young people spend their time (e.g. exposure to violence on the streets, exposure to harmful social norms related to gender, relationships and consent);
  - f. that peer on peer abuse hinges upon young people’s experiences of power, and ultimately the notion of consent (while young people who abuse their peers have power over the young person they are harming, they may be simultaneously powerless in relation to some peers who are encouraging their behaviour or in the home where they are being abused).
86. The Nursery also recognises that an alleged perpetrator is likely to have considerable unmet needs as well as posing a significant risk of harm to other children. Any decision on action in respect of the alleged perpetrator must be based on the risk they pose to other children and what can be done to minimise this risk. Assessment of an alleged perpetrator’s needs will include consideration of:
  - a. the nature, extent and context of the abusive behaviours;
  - b. the young person’s development and family and social circumstances;
  - c. whether the young person appears to pose a continuing risk and, if so -
  - d. who is likely to be at risk from him/her, and the nature and degree of the risk;
  - e. the young person’s need for services, both those which relate to his/her harmful behavior and other significant needs;
  - f. whether the young person is also at risk of significant harm and should be the subject of a child protection conference; and

g. whether action is to be taken within the criminal justice system.

87. Appropriate action, recording, referring and support will be put in place in line with the usual safeguarding procedures.

We will report this in the same way we do for adults abusing children, and will take advice from the appropriate bodies on this area; to support for both the victim and the perpetrator, as they could also be a victim of abuse. We know that children who develop harmful sexual behaviour have often experienced abuse and neglect themselves.

### **Peer on peer abuse: sexual violence and sexual harassment between children in Nurseries**

88. Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment.

89. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physically and verbally) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support. Reports of sexual violence and sexual harassment are extremely complex to manage. It is essential that victims are protected, offered appropriate support and every effort is made to ensure their education is not disrupted. It is also important that other children, children and Nursery staff are supported and protected as appropriate.

90. Staff should be aware of the importance of:

- a. making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- b. not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”;
- c. challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours has the potential to normalise them.

91. It is important to understand that all of the above can be driven by wider societal factors beyond the Nursery, such as everyday sexist stereotypes and everyday sexist language. This is why a whole-Nursery approach (especially preventative education) is important.

92. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. In some cases, the victim may not make a direct report. For example, a friend may make a report, or a member of Nursery staff may overhear a conversation that suggests a child has been harmed.

93. As with all safeguarding concerns, it is important that in such instances staff take appropriate action in accordance with the Safeguarding (Child Protection) Policy. Staff should not assume that someone else is responding to any incident or concern. If in any doubt, staff should speak to the Designated Safeguarding Lead (or a deputy). In such cases, the basic safeguarding principles remain the same, but it is important for the Nursery to understand why the victim has chosen not to make a report themselves. This discussion should be handled sensitively and with the support of children's social care if required.
94. There may be reports where the alleged sexual violence or sexual harassment involves children from the same Nursery but is alleged to have taken place away from the Nursery premises, or online. There may also be reports where the children concerned attend two or more different Nurseries. The safeguarding principles, and individual Nursery's duties to safeguard and promote the welfare of their children, remain the same. In such circumstances, appropriate information sharing and effective multi-agency working will be especially important. (Sexual violence and sexual harassment between children in schools, DfE, 2021)

### Peer-on-peer abuse: sharing nudes and semi nudes

The UK Council for Child Internet Safety in partnership with the NSPCC define the term 'sharing nudes and semi-nudes' to mean the sending or posting of nude or semi-nude images, videos or live streams by young people under the age of 18 online. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline.

The term 'nudes' is used as it is most commonly recognised by young people and more appropriately covers all types of image-sharing incidents.

The motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexually or criminally motivated. Such images may be created and shared consensually by young people who are in relationships, as well as between those who are not in a relationship. It is also possible for a young person in a consensual relationship to be coerced into sharing an image with their partner. Incidents may also occur where:

- children and young people find nudes and semi-nudes online and share them claiming to be from a peer
- children and young people digitally manipulate an image of a young person into an existing nude online
- images created or shared are used to abuse peers e.g. by selling images online or obtaining images to share more widely without consent to publicly shame

The sharing of nudes and semi-nudes can happen publicly online, in 1:1 messaging or via group chats and closed social media accounts.

Nude or semi-nude images, videos or live streams may include more than one child or young person.

Creating and sharing nudes and semi-nudes of under-18s (including those created and shared with consent) is illegal which makes responding to incidents

involving children and young people complex.

What to do if an incident comes to a staff member's attention:

- report it to the designated safeguarding lead (DSL)
- never view, copy, print, share, store or save the imagery yourself, or ask a child to share or download – this is illegal
- if the staff member has already viewed the imagery by accident (e.g. if a young person has showed it to them before they could ask them not to), report this to the DSL (or equivalent) and seek support
- do not delete the imagery or ask the young person to delete it
- do not ask the child/children or young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL (or equivalent)
- do not share information about the incident with other members of staff, the young person(s) it involves or their, or other, parents and/or carers
- do not say or do anything to blame or shame any young people involved
- do explain to them that it will need to be reported and reassure them that they will receive support and help from the DSL (or equivalent)

Palm Tree Nursery should refer to the guidance 'Sharing nudes and semi-nudes: advice for education settings working with children and young people' when dealing with such incidents. Any disclosures, will be dealt with in line with procedures set out in this policy and subsequent referrals will be made in a timely manner.

In line with nursery's general safeguarding procedures, all decisions and actions, including dates and times and reasoning will be logged.

## Faith abuse

95. Faith abuse is the belief in concepts of witchcraft and spirit possession, demons or the devil acting through children.

96. In working to identify such child abuse it is important to remember every child is different. Some children may display a combination of indicators of abuse whilst others will attempt to conceal them. There are a range of common features across identified cases. These indicators of abuse, which may also be common features in other kinds of abuse, include:

- a child's body showing signs or marks, such as bruises or burns, from physical abuse;
- a child becoming noticeably confused, withdrawn, disorientated or isolated and appearing alone amongst other children;
- a child's personal care deteriorating, for example through a loss of weight, being hungry, turning up to Nursery without snack or lunch, or being unkempt with dirty clothes and even faeces smeared on to them;
- it maybe directly evident that the child's parent or carer does not show concern for or have a close bond with the child;

- e. a child's attendance at Nursery becoming irregular or the child being taken out of Nursery altogether without another Nursery place having been organised, or a deterioration in a child's performance at Nursery;
- f. a child reporting that they are or have been accused of being 'evil', and/or that they are having the 'devil beaten out of them'.

97. All agencies should be alert to the indicators above and should be able to identify children at risk of this type of abuse and intervene to prevent it.

### **Fabricated illness**

98. Fabricated or induced illness (FII) is a form of child abuse. It occurs when a parent or carer, usually the child's biological mother, exaggerates or deliberately causes symptoms of illness in the child. FII is also known as "Munchausen's syndrome by proxy"(not to be confused with Munchausen's syndrome, where a person pretends to be ill or causes illness or injury to themselves).

99. FII covers a wide range of symptoms and behaviours involving parents seeking healthcare for a child. This ranges from extreme neglect (failing to seek medical care) to induced illness. Behaviours in FII include a parent or other carer who:

- a. Persuades healthcare professionals that their child is ill when they're perfectly healthy;
- b. exaggerates or lies about their child's symptoms;
- c. manipulates test results to suggest the presence of illness – for example, by putting glucose in urine samples to suggest the child has diabetes;
- d. deliberately induces symptoms of illness—for example, by poisoning her/his child with unnecessary medication or other substances.

### **Child criminal exploitation: county lines**

100. Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns.

101. Key to identifying potential involvement in county lines are missing episodes in education, when the victim may have been trafficked for the purpose of transporting drugs. Like other forms of abuse and exploitation, county lines exploitation can affect:

- a. Any child or young person (male or female) under the age of 18years, even if the activity appears consensual. The perpetrators may well be part of a group; single/mixed sexed;
- b. any vulnerable adult over the age of 18 years.

102. County Lines is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive



ability, physical strength, status, and access to economic or other resources (Keeping Children Safe in Education, DfE 2021).

### So-called 'honour-based' violence

103. So-called 'honour-based' violence (HBV) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators.
104. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBV are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBV, or already having suffered HBV.
105. If staff have a concern regarding a child that might be at risk of HBV, they should activate local safeguarding procedures, using existing national and local protocols for multi agency liaison with police and children's social care (Keeping Children Safe in Education, DfE, 2021).
106. Under the Voyeurism (Offences) Act 2019, it is an offence to operate equipment and to record an image beneath a person's clothing without consent and with the intention of observing, or enabling another person to observe, the victim's genitals or buttocks (whether exposed or covered with underwear), in circumstances where their genitals, buttocks or underwear would not otherwise be visible, for a specified purpose. 129. A "specified purpose" is namely:
- a. Obtaining sexual gratification (either for themselves or for the person they are enabling to view the victim's genitals, buttocks or underwear).
  - b. To humiliate, distress or alarm the victim. 130. "Operating equipment" includes enabling, or securing, activation by another person without that person's knowledge, e.g. a motion activated camera. 131. Upskirting will not be tolerated by the school. 132. Any incidents of upskirting will be reported to the Designated Safeguarding Lead who will then decide on the next steps to take, which may include police involvement.

### Online risks

107. The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; sexual predation: technology often provides the platform that facilitates harm. An effective approach to online safety empowers a Nursery to protect and educate the whole Nursery or community in their use of technology and establishes mechanisms to identify, intervene in and escalate any incident where appropriate.



## Further information of specific safeguarding issues

108. Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. The NSPCC offers information for Nurseries on its website [www.nspcc.org.uk](http://www.nspcc.org.uk). Broad government guidance on the issues listed below can also be accessed via the [www.gov.uk](http://www.gov.uk) website:

[child missing from home or care](#)

[child sexual exploitation \(CSE\)](#)

[bullying including cyber bullying](#)

[domestic violence](#)

[drugs](#)

[fabricated or induced illness](#)

[faith abuse](#)

[female genital mutilation \(FGM\)](#)

[gangs and youth violence](#)

[gender-based violence/violence against women and girls \(VAWG\)](#)

[hate](#)

[mental health](#)

[missing children and adult's strategy](#)

[private fostering](#)

[preventing radicalisation](#)

[PREVENT for Nurseries](#)

[use of socialmedia for online radicalisation](#)

## Recognising children who maybe particularly vulnerable

109. Some children may have an increased risk of abuse. Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues and reluctance on the part of some adults to accept that abuse can occur.

## Children who are looked after

110. The most common reason for children becoming looked after is as a result of abuse and/or neglect. The Nursery will ensure that staff have the skills, knowledge and understanding to keep looked after children safe.
111. In particular, the Nursery will ensure that appropriate staff have the information they need in relation to a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order) and contact arrangements with birth parents or those with parental responsibility. The Nursery also collate information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her. The designated safeguarding lead should have details of the child's social worker and the name of the virtual Nursery head in the authority that looks after the child.
112. A previously looked after child potentially remains vulnerable and all staff should have the skills, knowledge and understanding to keep previously looked after children

safe. When dealing with looked after children and previously looked after children, it is important that all agencies work together, and prompt action is taken on concerns to safe guard these children, who are a particularly vulnerable group.

113. The Nursery's designated Safeguarding team will work with local authorities to promote the educational achievement of registered children who are looked after (the DSL). On commencement of sections 4 to 6 of the Children and Social Work Act 2017, designated teachers will also have responsibility for promoting the educational achievement of children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales. The designated teacher must have appropriate training and the relevant qualifications and experience (Keeping Children Safe In Education, DfE 2021).

### **Children with special educational needs and disabilities**

114. Children with special educational needs (SEN) and disabilities can face additional safeguarding challenges. These can include:

- a. assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- b. being more prone to peer group isolation than other children;
- c. the potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs;
- d. communication barriers and difficulties in overcoming these barriers.

115. To address these additional challenges, the Nursery should consider extra pastoral support for children with SEN and disabilities.

116. When applying disciplinary measures such as restraint or isolation in response to incidents involving children with SEN and disabilities, the Nursery should consider the risks carefully, given the additional vulnerability of the group. However, to safeguard a child and others, it may be necessary to use restraint.

117. By planning positive and proactive behaviour support, the Nursery can reduce the occurrence of risky behaviour and the need to use restraint. (Keeping Children Safe in Education, DfE, 2021)

### **Other considerations**

118. In addition to the above, to ensure that all our children receive appropriate protection, the Nursery will give special consideration to children who are:

- a. living in a domestically abusive situation;
- b. affected by parental substance misuse;
- c. asylum seekers;
- d. regularly absent from the Nursery;
- e. attending alternative provision or subject to a managed move;
- f. living away from home (frequent movers);
- g. vulnerable to being bullied, or engaging in bullying;

- h. living in temporary accommodation; for example, living in hotel/hostel accommodation;
- i. living a transient lifestyle;
- j. living in chaotic and unsupportive home situations;
- k. vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion or sexuality;
- l. involved directly or indirectly in prostitution or child trafficking;
- m. speakers of another first language;
- n. children that are subject to a Child Protection Plan;
- o. children that are subject to a Child in Need Plan
- p. children that maybe vulnerable to messages of violence and extreme ideologies.

## Children missing from education

119. A child going missing from education is a potential indicator of abuse or neglect.
120. The Nursery will ensure its procedures for dealing with children who go missing from education, particularly on repeat occasions, are rigorously implemented to help identify the risk of abuse and neglect and to help prevent the risks of their going missing in the future.
121. The Nursery will inform the Local Authority of any children who are failing to attend the Nursery regularly or going to be deleted from the admission register under all fifteen grounds for deletion. This will be done as soon as the grounds for deletion are met, but no later than deleting the child's name from the register. The Nursery will record details of the child's residence, the name of the person with whom they will reside, the date from which they will reside there, and the destination Nursery (where this can reasonably be obtained). The Nursery will inform the Local Authority of the child's destination Nursery and home address.
122. The Nursery will inform the Local Authority of any child who fails to attend Nursery, at such intervals as are agreed between the Nursery and the Local Authority (or in default of such agreement, at intervals determined by the Secretary of State).
123. The Nursery will work collaboratively with the Local Authority to make reasonable enquiries about a child's whereabouts where there is a continuous absence after a grant of leave.
124. The Nursery will inform the Local Authority when registering new children within five days, including the child's address and previous Nursery (where this can reasonably be obtained).
125. The Nursery will cooperate with the Local Authority on the provision of the above information for children leaving or joining the Nursery at standard transition points.

## Emergency contacts for children

126. Wherever possible, the Nursery will hold more than one emergency contact number for their children. This goes beyond the legal minimum and is good practice to give the Nursery additional options to make contact with a responsible adult when a child missing education is also identified as a welfare and/or safeguarding concern (Keeping Children Safe in Education, DfE, 2021).

## Dealing with safeguarding concerns and incidents<sup>2</sup>

### Responding to a disclosure

127. If a child reports that they are being abused and neglected, staff should listen to them, take their allegation seriously, and reassure them that action will be taken to keep them safe.
128. It takes a lot of courage for a child to disclose that they are being abused. They may feel ashamed, particularly if the abuse is sexual; their abuser may have threatened what will happen if they tell; they may have lost all Management in adults; or they may believe, or have been told, that the abuse is their own fault.
129. If a child talks to a member of staff about any risks to their safety or wellbeing, the staff member will need to let the child know that they must pass the information on – staff are not allowed to keep secrets. The point at which they tell the child this is a matter for professional judgement. If they jump in immediately, the child may think that they do not want to listen. If left until the very end of the conversation, the child may feel that they have been misled into revealing more than they would have otherwise.
130. Where Nurseries are using an online safeguarding management system, they are required to ensure that all records required in this section are produced using the recording preform as and templates of the system.

131. During their conversations with the children, staff will:

- a. allow them to speak freely; listening carefully and uncritically;
- b. endeavour to utilize a neutral translator if necessary;
- c. remain calm and collected –the child may stop talking if they feel they are upsetting their listener;
- d. give reassuring nods or words of comfort and reassure the child that they are right to tell –‘I’m sorry this has happened’, ‘I want to help’, ‘This isn’t your fault’, ‘You are doing the right thing in talking to me’;
- e. not be afraid of silences – staff must remember how hard this must be for the child;
- f. consider their own body language and the messages it may send a child regarding the nature of the disclosure;
- g. under no circumstances ask investigative questions– such as how many times this has happened, whether it happens to siblings too, or what does the child’s mother think;
- h. tell the child that in order to help them, if appropriate, the member of staff must pass the information on;
- i. not automatically offer any physical touch as comfort- it maybe anything but comfort to a child who has been abused;
- j. avoid admonishing the child for not disclosing earlier. Saying things such as ‘I do wish you had told me about this when it started’ or ‘I can’t believe what I’m hearing’ may be interpreted by the child to mean that they have done something wrong;
- k. tell the child what will happen next - the child may agree to go to see the Designated Safeguarding Lead otherwise it is the duty of the member of staff to inform the Designated Safeguarding Lead of what has been discussed (if the child does agree to go and see the Designated Safeguarding Lead, the staff member should inform the Designated Safeguarding Lead that the child will be coming to see them at some point).

132. Following the conversation, the staff will report the disclosure as outlined in Section Responding to a concern that a child is at risk taking precaution to report to the Designated Safeguarding Lead even if the child has promised to do it by themselves and following up with a written record. Staff should seek support if they feel distressed.

## Responding to a concern that a child is at risk

133. There will be occasions when, in the absence of a disclosure, staff may suspect that a child may be at risk but have no 'real' evidence. The child's behaviour may have changed, their artwork could be bizarre or concerning, children might write stories or poetry that reveal confusion, distress or extreme beliefs, or physical but inconclusive signs may have been noticed. In these circumstances, staff will give the child the opportunity to talk. The signs they have noticed may be due to a variety of factors, for example, a parent has moved out, a pet has died, a grandparent is very ill. It is fine for staff to ask the child if they are OK or if they can help in any way.
134. Staff should report their concerns as outlined in Section Responding to a concern that a child is at risk.

## Reporting safeguarding concerns

135. Recording procedures will be fully explained to all staff to ensure concerns are reported quickly and records are as concise and unambiguous as possible.
136. All concerns, suspicions and disclosures should be recorded using the Nursery's Safeguarding Concern Form (see Appendix 4). Blank copies of the Safeguarding Concern Form should be kept in the staffroom for all to access when necessary.
137. Staff should immediately report:
- a. Any suspicion that a child is injured, marked, or bruised in a way which is not readily attributable to the normal knocks or scrapes received in play;
  - b. any explanation given which appears inconsistent or suspicious;
  - c. any behaviours which give rise to suspicions that a child may have suffered harm (e.g. significant changes in behaviour, worrying drawings or play);
  - d. any concerns that a child may be suffering from inadequate care, ill treatment, or emotional maltreatment;
  - e. any concerns that a child is presenting signs or symptoms of abuse or neglect;
  - f. any significant changes in a child's presentation, including non-attendance;
  - g. any hint or disclosure of abuse or neglect received from the child, or from any other person, including disclosures of abuse or neglect perpetrated by adults outside of the family or by other children or young people;
  - h. any concerns regarding person(s) who may pose a risk to children (e.g. staff in Nursery or a person living in a household with children present) including inappropriate behaviour e.g. inappropriate sexual comments; excessive one-to-one attention beyond the requirements of their usual role and responsibilities; or inappropriate sharing of images;
  - i. any discovery that FGM appears to have taken place on a girl under 18 years;
  - j. any expressions of extremist ideologies that suggest vulnerability to radicalisation.

138. Where no disclosure has been made, but a member of staff has concerns regarding the welfare or well-being of a child, they should make a written account of such concerns using Part 1 of the Safeguarding Concern Form (and Part 3 if applicable).
139. Where a disclosure has been made, a written factual account record, using the child's own words, should be made using Part 1 and Part 2 of the Safeguarding Concern Form (and Part 3 if applicable).
140. When completing the Safeguarding Concern Form, professional opinion may be expressed, but should be supported by stating the facts with observations upon which the opinion is based (e.g. Adam appeared angry as she was kicking the table and swearing). All notes should differentiate clearly between fact, opinion, interpretation, observation, and/or allegation.
141. All recorded concerns should be passed to the Designated Safeguarding Lead as soon as is possible, and in any case within 24hrs. In some cases, it may be necessary to pass on concerns verbally and follow them up in writing soon after. In the absence of this person, the Deputy Designated Safeguarding Lead should be approached.
142. Any records should be dated and signed with the name of the signatory clearly printed. Any handwritten notes made immediately after the event can act as evidence of them being written at the time in any future court case. Therefore, these should not be destroyed if the details are recorded more formally, but instead kept securely attached to the Safeguarding Concern Form. If the Nursery is using an online reporting system, any written notes will be uploaded to the online data base. A copy will also be kept in the child's Child Protection File.



143. Staff will follow the reporting procedures outlined in this policy. However, anybody can make a direct referral. They may share information directly with Children's Social Care, police or the NSPCC if:

- a. the situation is an emergency and the Designated Safeguarding Lead, their deputy, the Head teacher are all unavailable;
- b. they are convinced that a direct report is the only way to ensure the child's safety.

144. Key points for staff to remember for taking action are:

- a. report the concern to the Designated Safeguarding Lead as soon as is possible, within 24hrs at the latest;
- b. in an emergency, take the action necessary to help and protect the child, for example, call 999;
- c. not to start their own investigation;
- d. share information on a need-to-know basis only – do not discuss the issue with colleagues, friends or family;
- e. complete the Safeguarding Concern Form;
- f. seek support if distressed.

## Responding to safeguarding concerns

The designated safeguarding lead will:

- a. keep accurate records of incidents of self-harm and concerns
- b. follow up any medical emergencies or referrals
- c. liaise with local services about help available for young people who self-harm
- d. keep up-to-date information about self-harm, e.g. info leaflets from Young Minds
- e. liaise with the wider safeguarding and pastoral team
- f. contact the parents at the appropriate time. Involve the pupil in this process. Inform the parent about the appropriate help and support that is available for their child. Monitor the pupil's progress, e.g. school work, general presentation, following the incident
- g. know when to seek help to deal with their own feelings and distress

145. A concern raised may not progress any further than a discussion with the Designated Safeguarding Lead. A record of the discussion and any initial action taken will be recorded in Part4 of the Safeguarding Concern Form.

146. When dealing with a case, the Designated Safeguarding Lead will consider:

- a. Am I dealing with 'risk' or 'need'? (by definition, a child at risk is also a child in need.
- b. However, what is the priority /level and immediacy of risk /need?)
- c. Can the level of need identified be met:
- d. in or by the Nursery or by accessing universal services without referral to Children's Social Care or other targeted services by working with the child, parents and colleagues;

- e. What resources are available to me / the Nursery and what are their limitations;
- f. Is the level of need such that a referral needs to be made to Children's Social Care which requests that an assessment of need be undertaken;
- g. Is the level and/or likelihood of risk such that a child protection referral needs to be made (i.e. a child is suffering or is likely to suffer significant harm);
- h. What information is available to me: child, parents, family and environment;
- i. What information is inaccessible and, potentially, how significant might this be;
- j. Who do I/don't I need to speak to now and what do they need to know;
- k. Where can I access appropriate advice and/or support;
- l. If I am not going to refer, then what action am I going to take

147. The Designated Safeguarding Lead will make a referral to Children's Social Care if it is believed that a child is suffering or is at risk of suffering significant harm. The child (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child.

148. In making this decision, the Designated Safeguarding Lead will consider the Safeguarding Partners' threshold document and frame work for action that includes:

- a. the process for the early help assessment and the type and level of early help services to be provided;
- b. the criteria, including the level of need, for when a case should be referred to Local Authority Children's Social Care for assessment and for statutory services.

149. Where a Designated Safeguarding Lead or Deputy Designated Safeguarding Lead considers that a referral to Children's Social Care may be required, they must consider:

- a. Is this a Child In Need? – Under section 17 (s.17(10)) of the Children Act 1989, a child is 'in need' if:
- b. the child is unlikely to achieve or maintain, or to have the opportunity to achieve or maintain, a reasonable standard of health or development, without the provision of services by a local authority;
- c. the child's health or development is likely to be impaired, or further impaired, without the provision of such services;
- d. the child is disabled.
- e. Is this a Child Protection Matter? - Under section 47(1) of the Children Act 1989, a local authority has a duty to make enquiries where they are informed that a child who lives or is found in their area:
- f. is the subject of an Emergency Protection Order;
- g. is in Police Protection;
- h. or where they have reasonable cause to suspect that a child is suffering or is likely to suffer significant harm.

150. Therefore, it is the 'significant harm' threshold that justifies statutory intervention into family life.

151. A professional making a child protection referral under s.47 must therefore provide information which clearly outlines that a child is suffering or is likely to suffer significant harm. The Designated Safeguarding Lead will make judgements around 'significant harm', levels of 'need and risk' and when to refer.

152. Once a referral has been made, Children's Social Care should respond within one working day indicating what further action they have decided to take. This may include further assessment of the child either through an early help assessment, through a Child In Need Assessment (section 17 Children Act 1989) or a Child Protection Enquiry (section 47 Children Act 1989). The Nursery will participate in Strategy Discussions and Child Protection Conferences as required.

153. Referrals regarding extremism will be made to Children's Social Care. In line with government advice, a Channel Co-coordinator/Police Practitioner will be fully embedded in the safeguarding arrangements of Children's Social Care if required. Where assessment does not indicate a genuine vulnerability to being drawn into terrorism, a case will be signposted to other more appropriate support services following consultation with the LADO.

### **Record keeping**

154. A Child Protection File will be started for an individual child as soon as the Nursery is aware of any child protection concerns about them. This may arise in a number of ways:

- a. if a member of staff raises a concern about the welfare or well-being of a child (this should be recorded in writing using Appendix 4 Part 1 (and 3 if applicable);

- b. if a child makes a disclosure (this should be recorded in writing using Appendix 4 Part 1 and 2 (and 3 if applicable));
  - c. if information is passed to the Nursery by a previous Nursery attended by the child;
  - d. if the Nursery is alerted by another agency (e.g. police, health or social care) of child protection concerns about that child.
- 155. The Child Protection File will have a front sheet (see Appendix 5) on the file which records the child's full name, date of birth, address and information about family members.
- 156. Separate files will be kept for individual siblings, cross referencing to other children in the family.
- 157. Relevant, and as necessary, redacted information will be copied and placed on each individual sibling's file.
- 158. If more than one file exists in relation to an individual child, this will be indicated on each file.
- 159. Each file will be numbered and dated (e.g. January 2015, Vol. 1 of 3).
- 160. If information is removed from the file for any reason, a record should be made indicating the reason for such removal, where the information has gone, when it was removed and who removed it (see Appendix 6). The Designated Safeguarding Lead will be notified of the removal of any information from a file.
- 161. The Child Protection File will contain:
  - a. A Child Protection File front sheet (see Appendix 5)
  - b. a detailed chronology, updated on a regular basis, at the front of the file (see Appendix 7);
  - c. any concerns raised by staff;
  - d. all safeguarding/concern reports, notes and correspondence referring to the child;
  - e. copies of any referrals;
  - f. any child protection information received from previous Nurseries or other agencies;
  - g. notes/minutes of any Child Protection Conferences etc;
  - h. record of any instances where information has been removed from the file.
- 162. The Nursery will have a record whether the child is subject to a Child Protection Plan or if they are a Child in Care.
- 163. The Child Protection File will also cross-reference other relevant records held in Nursery (e.g. relating to the Common Assessment Framework (CAF)/Early Help Assessment (EHA), early support, Special Educational Need).
- 164. All records of child protection concerns, disclosures or allegations will be treated as sensitive information and kept together. Child protection information will be stored separately from the child's Nursery file and the Nursery file will be 'tagged' to indicate

that separate information is held. All staff who may need to consult a child's Nursery file will be made aware of what the symbol means, and who to consult if they see this symbol. The information will be shared with those who need to have it.

165. All Child Protection Files will be kept together in a secure place. The filing system will be accessed via the Designated Safeguarding Lead. Any electronic information will be password protected and only made available to relevant individuals.

166. Child protection information will be stored and handled in line with Data Protection Act 1998 principles such that information is:

- a. processed for limited purposes;
- b. adequate, relevant and not excessive;
- c. accurate;
- d. kept no longer than necessary;
- e. processed in accordance with the data subject's rights;
- f. secure.

167. Every effort will be made to prevent unauthorised access, and sensitive information will not be stored on laptop computers, which, by the nature of their portability, could be lost or stolen. If it is necessary to store child protection information on portable media, such as a CD or flash drive, these items will also be kept in locked storage.

168. In relation to Safeguarding, GDPR does not prevent, or limit, the sharing of information for the purposes of keeping children safe. Information can be shared without consent if not doing so would place a child at risk. In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any information with the new school in advance of a child leaving. For example, information that would allow the new school to continue supporting victims of abuse and have that support in place for when the child arrives.

## **Record transfers**

169. It is imperative that relevant child protection information is forwarded to the new/receiving establishment by the establishment that the subject child is departing and that this happens as quickly as possible.

170. Such information sharing should occur between Designated Safeguarding Leads and/or Manager as soon as possible and, in any event, within 5 days of the child's departure.

171. When a file is to be transferred, a 'Record of Child Protection File Transfer' should be completed and attached to the Child Protection File (see Appendix 8).

172. It is inappropriate to simply forward all relevant documentation as this leaves the former Nursery with no record. Rather:

- a. Where feasible, Designated Safeguarding Leads from former and receiving Nurseries should arrange to meet and share relevant information, with copies of relevant and appropriate documentation being provided; or
- b. alternatively, telephone discussions should take place followed-up with appropriate summaries / chronologies and copies of key records.

173. The new Nursery/college should be provided with the ORIGINAL documentation.

174. Where a parent elects for Home Education, the child is from a traveler, migrant or Roman family, and/or where the receiving Nursery's identity is not known, the Designated Safeguarding Lead at the former Nursery should contact Children's Social Care for advice.

## **Access to child protection files**

175. The safety and welfare of a child must always be considered when making decisions whether to share confidential information.

176. A child who has a Child Protection File has the right to access their personal record. This is known as the right of subject access under the Data Protection Act.

177. Parents (i.e. those with parental responsibility in law) may exercise the right of subject access on behalf of their child if they are unable to act on their own behalf or give their permission. As a general guide, a child of 12 or older is expected to be mature enough to make this kind of request independently or provide permission.

178. All requests for a right of subject access under the Data Protection Act must be made in writing.
179. There are circumstances where the right of subject access would be denied; for example, where the information might cause harm to the physical or mental health of the child or another individual or would be likely to prejudice an ongoing criminal investigation. The establishment will take advice when a right of subject access under the Data Protection Act is received.
180. There is a cost for the provision of the record. This is determined by the Data Protection Act and it depends on the number of pages provided. For example, 1 to 19 pages will cost £1.20; 20 pages will cost £2, and so on, up to a maximum of 500+ pages which will cost £50.
181. When staff have information, they feel needs to be shared within the Nursery or with an external agency such as the Police, they should seek advice from the Designated Safeguarding Lead. The Designated Safeguarding Lead may consult the LADO.
182. In the vast majority of cases, the child and family's consent to sharing should be sought. If consent has been withheld, this must be recorded, including the reason given for withholding consent. Exceptions to the requirement to gain consent are that if seeking such consent could:
- a. increase the risk of harm to the child or someone else;
  - b. undermine the prevention, detection or prosecution of a serious crime (a crime that causes or is likely to cause significant harm to a child, young person or adult);

Interfere with any potential investigation. Access to the information on file should be on a need-to-know basis among the staff. This can only be decided on a case-by-case basis. The confidentiality of the child and family should be respected as far as possible, but the welfare of the child is paramount. It would be unlikely that every member of staff needs to know the details of a case. Generally speaking, the closer the day-to-day contact with the child, the more likely the need to know an outline of the case. Essentially, if someone receives information in his/her professional capacity and the person giving that information believes it will be treated securely, and that belief is reasonable, then the recipient of the information will be under a duty to treat it securely.

183. The names of any other children, other than the child who is the subject of the record, should be removed when disclosing records, unless consent is obtained from the individual/s concerned (or their parent/carer on their behalf). Care should be taken to ensure all identifying information is removed from the copy of the record to be shared.
184. Child protection information should not ordinarily be shared with agencies other than statutory agencies such as the Police (e.g. information should not be released to solicitors etc). Where such a request is made, advice should be sought.

185. Conversations between designated personnel at different Nurseries (e.g. sharing concerns or asking for information about sibling groups) are perfectly acceptable. Where possible, consent from parents should be sought before a conversation takes place. Any relevant child protection information coming to light should be carefully logged.

## **Retention of child protection files**

186. According to current guidance from the Records Management Society's Nurseries Retention Schedule, records must be kept (securely) until the subject's 25<sup>th</sup> birthday, after which they should be shredded (Child Protection records relating to Children's Social Care involvement will be retained for much longer than this by the Local Authority in any event).

187. The Data Protection Act requires that Nurseries, or other bodies that keep information, maintain a list of records which have been destroyed and who authorized their destruction. Members of staff should record at least:

- a. File reference (or other unique identifier);
- b. file title (or brief description);
- c. number of files (and date range);
- d. the name of the authorising officer;
- e. Date action taken.

188. This could be kept in an Excel spreadsheet or other database format.

## **Support for those involved in a child protection issue**

189. The Nursery will support children, their families, and staff by:

- a. taking all suspicions and disclosures seriously;
- b. nominating a link person (Designated Safeguarding Lead) who will keep all parties informed and be the central point of contact;
- c. nominating separate link people for the child and member of staff, where a member of staff is the subject of an allegation made by a child, to avoid any conflict of interest;
- d. responding sympathetically to any request from children or staff for time out to deal with distress or anxiety;
- e. maintaining confidentiality and sharing information on a need-to-know basis only with relevant individuals and agencies;
- f. storing records securely;
- g. offering details of helplines, counselling or other avenues of external support;
- h. following the procedures laid down in the Nursery's whistleblowing, complaints and disciplinary procedures;
- i. cooperating fully with relevant statutory agencies;
- j. making sure a neutral interpreter is available when English is not the child's first language.



## **SUPPORTING VICTIMS OF ABUSE**

Palm Tree Nursery is committed to ensuring victims feel supported to refer the most serious allegations to the police via the helpline, safe in the knowledge that everything possible will be done to bring offenders to justice. No child or young person should have to experience abuse. But if something isn't right, they should speak to someone they Management to raise concerns, whether that's family, a friend, teacher or social worker, helpline or the police.

A new helpline to support potential victims of sexual harassment and abuse in education settings has been set up. The dedicated NSPCC helpline number is 0800 136 663.

190. The Nursery recognises that children who are abused or who witness violence may find it difficult to develop a sense of self-worth and to view the world in a positive way. This Nursery may be the only stable, secure and predictable element in the lives of children at risk. Whilst at Nursery, their behaviour may still be challenging and defiant and there may even be moves to consider suspension or exclusion from Nursery.

191. The Nursery will endeavour to support children through:

- a. the curriculum, to encourage self-esteem and self-motivation;
- b. the Nursery ethos, which promotes a positive, supportive and secure environment and which gives all children and adults a sense of being respected and valued;
- c. the implementation of behaviour management policies;
- d. a consistent approach, which recognizes and separates the cause of behaviour from that which the child displays. This is vital to ensure that all children are supported within the Nursery setting;
- e. regular liaison with other professionals and agencies who support the children and their families, in-line with appropriate confidentiality parameters;
- f. a commitment to develop productive, supportive relationships with parents, whenever possible and so long as it is in the child's best interests to do so;
- g. the development and support of a responsive and knowledgeable staff group trained to respond appropriately in child protection situations.

## Confidentiality

192. All staff are expected to:

- a. Ensure that information they receive about children is treated in a discreet and confidential manner;
- b. seek advice from a senior member of staff if they are in any doubt about sharing information they hold or which has been requested of them;
- c. be cautious about passing information to others about a child.

## Safer recruitment

193. The 'Recruitment and Selection Policy' sets out the Management's approach to safer recruitment. All staff should endeavour to follow this during the recruitment and vetting of new staff.

194. The Nursery will also adhere to the guidance set out in Keeping Children Safe in Education Part 3 (2021).

195. In particular, the Nursery will:

- a. Ensure that all posts are advertised, ensuring that the advertisement makes prospective applicants aware of the Nursery's commitment to safeguarding and the requirement for an enhanced DBS disclosure with barred list information for people working in regulated activity with children;
- b. Ensure the Nursery adheres to the Equal Opportunities Policy. Vacancies should not indirectly discriminate by an unjustified provision, criterion or practice that puts people with a protected characteristic at a particular disadvantage. For example, vacancies should be open to part-time working or to be undertaken as a job share unless there is an objective justification for this not to be done;

- c. Ensure that an application form is used and that a CV is not accepted. If an individual submits a CV, then this should be disregarded during the shortlisting process. This Nursery should make this clear on all job advertisements;
- d. Prepare and provide a Job Description and Person Specification when posts are advertised;
- e. check the application form so that it has a full employment history with no gaps;
- f. ensure that at least one member of staff involved in the recruitment process has undertaken accredited safer recruitment training;
- g. ensure shortlisting is undertaken with reference to the person specification for the post. In addition to this the Nursery should ensure that short-listing is not taking place until after the closing date;
- h. ensure that two references will be sought as soon as short-listing has taken place and normally obtained prior to interview using the standard Star template Reference Request Form. No references will be sought without the prior agreement of the candidate. This permission is requested on the application form;
- i. explore the candidate's commitment to safeguarding and promoting the welfare of children during the interview process;
- j. use original documents to confirm qualifications, identity and address of the successful candidate.

196. The Nursery will ensure that any appointment is conditional upon:

- a. Receipt of two satisfactory references;
- b. Verification of identity (through photographic ID and proof of address);
- c. Verification of a certificate for an enhanced DBS check which will include barred list information, for those who will be engaging in regulated activity;
- d. Verification of the person's mental and physical fitness to carry out their work responsibilities;
- e. Verification of professional status if a teacher;
- f. Verification that a candidate for a teaching post is not subject to a prohibition order issued by Secretary of State via the DfE Secure Access Online Portal;
- g. Verification that a candidate for a role in the management of the Nursery (management position) is not subject to a section 128 direction made by the Secretary of State via the DfE Secure Access Online Portal;
- h. Verification that a candidate has not been subject to any restrictions imposed by regulators of the teaching profession in other EEA member states via the via the DfE Secure Access Online Portal;
- i. Verification of qualifications;
- j. Verification of the person's right to work in the United Kingdom;
- k. Any further checks considered appropriate where the person has lived or worked outside the UK;
- l. Satisfactory Vetting and Due Diligence checks (where applicable)

197. The Nursery will keep and maintain a Single Central Record (SCR) of recruitment and vetting checks, on the following people:

- a. all staff (including supply staff, and teacher trainees on salaried route) who work at the Nursery;
- b. all others who have been chosen by the Nursery to work in regular contact with children;

198. As a minimum, the Single Central Record will include whether the following checks have been carried out or certificates obtained, and the date on which each check was completed/certificate obtained:

- a. an identity check;
- b. a barred list check;
- c. an enhanced DBS check/certificate;
- d. a prohibition from teaching check;
- e. a Section 128 check;
- f. an EEA sanction/restriction check;
- g. further checks on people living or working outside the UK;
- h. a check of professional qualifications;
- i. a check of two references;
- j. verification of person's mental and physical fitness to work;
- k. verification of professional status;
- l. verification that the individual is disqualified under the Childcare (Disqualification) Regulations 2009 (where applicable);
- m. a check to establish the person's right to work in the United Kingdom;
- n. any further checks required where a person has lived or worked outside the UK; and
- o. vetting and due diligence check (where applicable).
- p. Birth certificate

199. For supply staff, the Nursery will also include whether written confirmation that the employment business supplying the member of supply staff has carried out the relevant checks and obtained the appropriate certificates, whether any enhanced DBS check certificate has been provided in respect of the member of supply staff, and the date that confirmation was received.

200. For volunteers, the Nursery should undertake a risk assessment and use their professional judgement and experience when deciding whether to obtain an enhanced DBS certificate for any volunteer not engaging in regulated activity. In doing so they should consider:

- a. the nature of the work with children;
- b. what the establishment knows about the volunteer, including formal or informal information offered by staff, parents and other volunteers;
- c. whether the volunteer has other employment or undertakes voluntary activities where referees can advise on suitability;
- d. whether the role is eligible for an enhanced DBS check;

201. Details of the risk assessment should be recorded.

202. To help determine the appropriate level of supervision Nurseries must have regard to the statutory guidance. This guidance requires that, for a person to be considered supervised, the supervision must be:

- a. By a person who is in regulated activity;
- b. regular and day to day;
- c. reasonable in all circumstances to ensure the protection of children (Keeping Children Safe in Education, DfE 2021).

203. Where the Nursery has concerns about an existing member of staff or a member of staff begins to work in a regulated activity, the Nursery will carry out all relevant checks as if the person were a new member of staff.

204. The Nursery will comply with its legal duty to refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult; where the harm test is satisfied in respect of that individual; where the individual has received a caution or conviction for a relevant offence, or if there is reason to believe that individual has committed a listed relevant offence; and that individual has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. Referrals will be made as soon as possible after the resignation or removal of the individual.

205. Where the Nursery dismisses or ceases to use the services of a teacher because of serious misconduct or might have dismissed them or ceased to use their services had they not left first, the Nursery will consider whether to refer the case to the Secretary of State, as required by sections 141D and 141E of the Education Act 2002.

206. The Nursery will maintain a Single Central Record of all staff employed at Palm Tree Nursery. The Head teacher will ensure the appointment of staff is dependent upon, as a minimum:

- a. verification of a certificate for an enhanced DBS check which will include barred list information, for those who will be engaging in regulated activity;
- b. verification of identity;
- c. any further checks considered appropriate where the person has lived or worked outside the UK;
- d. verification that the individual is not subject to a section 128 direction made by the
- e. Secretary of State Employer Access Online Service.

207. Guidance related to checks for contractors, visitors and trainee teachers etc. can be found in the Recruitment and Selection Policy.

## **Disqualification under the Childcare Act 2006 ( Not applicable)**

208. The Regulations refer to employing a person “in connection with” these provisions and it is therefore, concluded that:

- a. In Nurseries - all staff will be covered by the Regulations;
- b. Primary/Junior Nurseries - all staff will be covered by the Regulations as it is unlikely in such settings that staff are always exclusively working with those over the age of 8;

## **Allegations against members of staff**

209. If anyone makes an allegation that any member of staff (including any volunteer or management) may have:

- a. behaved in a way that has harmed a child, or may have harmed a child;
- a. possibly committed a criminal offence against or related to a child; or
- b. behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children (including the promotion of extreme ideologies).
- c. Behaved or may have behaved in a way that indicates they may not be suitable to work with children. (refer to KCSIE 2021 Part 1).

Then the allegation will be dealt with in accordance with national guidance and agreements, as implemented by the Safeguarding Partners.

210. The Head teacher, rather than the Designated Safeguarding Lead, will handle such allegations as Case Manager, unless the allegation is against the Head teacher, when the LADO or an appropriate person nominated by the LADO will act as Case Manager and handle the Nursery’s response.

211. In all instances, the Case Manager will have no role in the investigation at the onset of the allegation and the Manager must discuss the allegation with the Local Authority Designated Officer. The full procedures for dealing with allegations against staff can be found in the Safeguarding Partners policy on allegations against staff.

212. The Management team will be informed as soon as the Nursery becomes aware of any allegation against a staff member and the investigation process should not commence until advice has been taken.

213. Parents or carers of a child or children involved will be told about the allegation as soon as possible if they do not already know. However, there will be some cases that require a strategy discussion with Children’s Social Care and/or the police and it will be

within the strategy discussion that decisions are made as to what information can be disclosed to parents or carers.

214. In the event of an allegation being made, the Nursery will make every effort to maintain confidentiality and guard against unwanted publicity. Parents and carers will be made aware that under s141F of the Education Act 2011, there is a prohibition on reporting or publishing allegations about teachers, this includes via social media e.g. Facebook, Twitter etc and if breached this could lead to prosecution. If parents or carers wish to apply to the court to have reporting restrictions removed, they will be advised to seek legal advice.

215. Staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly and consistently and to be kept informed of its progress. Suspension is not mandatory, nor is it automatic but, in some cases, staff may be suspended where this is deemed to be the best way to ensure that children are protected.

216. While schools or colleges are not the employer of **supply teachers** they should ensure allegations are dealt with properly. In no circumstances should a school or college cease to use a supply teacher due to safeguarding concerns without finding out the facts and liaising with the local authority designated officer (LADO) to determine a suitable outcome. Governing bodies and proprietors should discuss with the agency whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, whilst they carry out their investigation. (KCSIE 2021).

217. Agencies should be fully involved and co-operate in any enquiries from the LADO, police and/or children's social services. The school or college will usually take the lead (in any investigation) because agencies do not have direct access to children or other school staff, so they will not be able to collect the facts when an allegation is made, nor do they have all the relevant information required by the LADO as part of the referral process. (KCSIE 2021).

218. The Nursery will make a referral to the Disclosure and Barring Service (DBS) if any member of staff is disciplined, dismissed, is currently under investigation or leaves prior to the end of an investigation for causing emotional, psychological, physical or sexual harm, neglect or risk of harm to children.

## External speakers and charities

219. As outlined in the Head Teacher's External Speakers and Charities Policy, external speakers and charities will be vetted to ensure children are not exposed to inappropriate political or controversial messages and charitable activity is free from harm and consistent with the values of the Nursery.

## Use of mobile phones and cameras

220. Children have their photographs taken to provide evidence of their achievements for developmental records (The Early Years Foundation Stage,).

221. Under the Data Protection Act 1998, the Nursery must seek parental consent to take photographs and use video recorders.
222. On admission, parents will be asked to sign their consent for photographs to be taken in Nursery or by the media for use in relation to promoting/publishing the Nursery. This consent will last for a maximum of 5 years only. This does not cover any other agency and if any other agency requests to take photographs of any child, then separate consent before photographs are taken will be sought.
223. Staff, volunteers and children are not permitted to use their own mobile phones to take or record any images of children for their own records during session times.
224. The Nursery's digital camera/s or memory cards must not leave the Nursery setting unless on an official Nursery trip. Photographs will be printed/uploaded in the setting by staff and once done images will be immediately removed from the camera's memory.
225. It is acknowledged that often photographs may contain other children in the background.
226. Cameras and mobile phones are prohibited in all toilet areas.

## Induction

All new members of staff will undergo an induction that includes familiarisation with the Nursery's Safeguarding (Child Protection) Policy and identification of their child protection training needs.

227. The Nursery's Induction Policy outlines the procedures for the induction of new staff.
228. New staff will be inducted fully so that they are able to contribute towards safeguarding and promoting the welfare of children.
229. Induction includes ensuring new staff are:
- a. aware of Nursery systems and structures for supporting the wellbeing of children (including online safety);
  - b. provided with adequate training on safeguarding issues and policy (including Safeguarding (Child Protection) Policy, Staff Code of Conduct, Behaviour Policy and the Nursery's safeguarding response for children who go missing in education. (Keeping Children Safe in Education, DfE, 2021);
  - c. introduced to the Designated Safeguarding Leads in Nursery who have responsibility for safeguarding;
  - d. made aware of the early help process;
  - e. made aware of the process for making referrals.
230. On Induction, all staff and volunteers will be given a copy of the Safeguarding (Child Protection) Policy, Staff Code of Conduct and 'Keeping Children Safe in Education – Part 1', DfE 2021. All staff will sign to confirm they have received these documents and will work within them (see Appendix 9).



## Training

231. Designated Safeguarding Leads will be expected to participate in training every two years. This will focus on identifying abuse, local reporting arrangements and disseminating training to Nursery staff.
232. All staff will participate in training on safeguarding on a regular basis and the Nursery will ensure staff are aware of any safeguarding and child protection updates. The Nursery will provide training to all existing staff at least once a year and all new staff during their induction (as outlined above). This training will focus on identifying and reporting abuse and neglect and safe working practices. Staff will be advised to maintain an attitude of 'it could happen here' where safeguarding is concerned.
233. Safeguarding training will also include the core elements of the 'Workshop to Raise Awareness of Prevent' (WRAP) an interactive and facilitated workshop developed by the Office for Security and Counter Terrorism. The training will provide staff with:
234. an awareness and understanding of the Prevent agenda and their role within it;
- a. the ability to use existing expertise and professional judgement to recognise potentially vulnerable individuals who may be susceptible to messages of violence and radicalisation;
  - b. the confidence to use a common sense based response;
  - c. Staff will also been encouraged to undertake the Channel general awareness online training module as a supplementary source of support.
235. As part of the safeguarding training, staff and volunteers will be given a copy of the Safeguarding (Child Protection) Policy, Staff Code of Conduct and 'Keeping Children Safe in Education – Part 1', DfE 2021. All staff will sign to confirm they have received these documents and will work within them (see Appendix 9).
236. Supply staff and other visitors will be given the Nursery's Visitor Guide, which outlines core Safe guarding measures.
237. Senior governors, the Manager and senior leaders will undertake safer recruitment training. This will enable them to participate in the recruitment of staff.
- Staff will be provided with adequate training on safeguarding issues and policy including Safeguarding and Child Protection policy, Staff Code of Conduct, Behaviour policy, Social Media policy (included in the Staff Code of Conduct) and the school's safeguarding response for children who go missing in education (Keeping children safe in education, DfE, 2021)
  - Staff, pupils and parents will be provided safeguarding and online safety.
  -

## Extended Nursery, off-site arrangements and alternative providers

238. This policy is also applicable to all children undertaking extended service activities. Where extended Nursery activities are provided by and managed by the Nursery, our own child protection policy and procedures apply.
239. If other organisations provide services or activities on our site, the Nursery will check that they have appropriate procedures in place, including safer recruitment procedures.
240. When children attend off-site activities, the Nursery will check that effective child protection arrangements are in place. This includes alternative provision and managed moves.
241. All organisations will be vetted to ensure children are not exposed to inappropriate political or controversial messages or activities.
242. Where a Nursery places a child with an alternative provision provider, the Nursery continues to be responsible for the safeguarding of that child and should be satisfied that the provider meets the needs of the child. The Nursery should obtain written confirmation from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at the establishment, i.e. those checks that the Nursery would otherwise perform in respect of its own staff (Keeping Children Safe in Education, DfE, 2021).

## Related Nursery policies

243. The Safeguarding (Child Protection) Policy should be read in conjunction with the following policies:

- Attendance and Punctuality
- Anti-bullying
- Behaviour
- Complaints
- CCTV
- Off Site Visits
- Equal Opportunities
- ICT Acceptable Use
- Equalities
- Health and Safety (includes First Aid)
- Home Nursery Agreement
- Induction
- Use of Reasonable Force
- Recruitment and Selection Policy
- SEN–Information, Policy and Guidance
- Staff Code of Conduct
- Disciplinary
- Whistleblowing

## Concerns about safeguarding practices

- 244. Staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the Nursery's safeguarding regime.
- 245. Where staff or volunteers wish to raise concerns, they should be raised with the Nursery's management team under the Whistleblowing Policy.
- 246. Where a staff member feels unable to raise the issue with the Nursery or feels that their genuine concerns are not being addressed, other whistleblowing channels maybe open to them.

## Complaints

- 247. The Nursery complaints procedure will be followed where a child or parent raises a concern about poor practice towards a child that initially does not reach the threshold for child protection action.

## Monitoring, evaluation and review

- 248. The policy will be promoted and implemented throughout the Nursery.
- 249. The Head teacher will monitor the operation and effectiveness of arrangements referred to in this policy at the Nursery.
- 250. The Head teacher will review this policy every year in consultation with the Nursery.

## Appendix 1: Designated Safeguarding Lead responsibilities

The broad areas of responsibility for the Designated Safeguarding Lead are:

### 1. Manage referrals

The designated safeguarding lead is expected to:

- a. Refer cases of suspected abuse to the local authority children's social care as required;
- b. Support staff who make referrals to local authority children's social care;
- c. Refer cases to the Channel programme where there is a radicalization concern as required;
- d. Support staff who make referrals to the Channel programme;
- e. Refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and
- f. Barring Service as required; and
- g. Refer cases where a crime may have been committed to the Police as required;
- h. Where appropriate, take the lead in relation to Early Help support.

### 2. Work with others

- a. Liaise with the head teacher or Manager to inform him or her of issues, especially on going enquiries under section 47/17 of the Children Act 1989 and police investigations;
- b. As required, liaise with the "case manager" (as per Part four) and the designated officer(s) at the local authority for child protection concerns (all cases which concern a staff member); and
- c. Liaise with staff (especially pastoral support staff, Nursery nurses, IT Technicians, and SENCOs or the named person with oversight for SEN in a college) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies; and Act as a source of support, advice and expertise for staff.

### 3. Under take training

The Designated Safeguarding Lead (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years.

The Designated Safeguarding Lead should undertake Prevent awareness training.

In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other Designated Safeguarding Leads, or simply taking time to read and digest safe guarding developments) at regular intervals, as required, but at least annually, to allow them to understand and keep up with any developments relevant to their role so they:

- a. Understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments;

- b. Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- c. Ensure each member of staff has access to and understands the Nursery's child protection policy and procedures, especially new and part-time staff;
- d. Are alert to the specific needs of children in need, those with special educational needs and young carers<sup>3</sup>;
- e. Are able to keep detailed, accurate, secure written records of concerns and referrals;
- f. Understand and support the Nursery with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- g. Are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at Nursery;
- h. Can recognize the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalization and are confident they have the capability to support SEND children to stay safe online;
- i. Obtain access to resources and attend any relevant or refresher training courses;
- j. Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the Nursery may put in place to protect them.

#### **4. Raise Awareness**

The Designated Safeguarding Lead should:

- a. ensure the Nursery child protection policies are known, understood and used appropriately;
- b. ensure the Nursery child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this;
- c. ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the Nursery in this; and
- d. link with the local LSCB to make sure staff are aware of training opportunities and the latest local policies on local safeguarding arrangements.
- e. help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school and college leadership staff. Their role could include ensuring that the school or college, and their staff, know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children.

## **5. Child protection file**

Where children leave the Nursery ensure their child protection file is transferred to the new Nursery as soon as possible. This should be transferred separately from the main child file, ensuring secure transit, and confirmation of receipt should be obtained. Receiving Nurseries should ensure key staff such as designated safeguarding leads and SENCOs or the named person with over sight for SEN in colleges, are aware as required.

In addition to the child protection file, the designated safe guarding lead should also consider if it would be appropriate to share any information with the new Nursery in advance of a child leaving. For example, information that would allow the new Nursery to continue supporting victims of abuse and have that support in place for when the child arrives.

## **6. Availability**

During term time the Designated Safeguarding Lead (or management) should always be available (during Nursery hours) for staff in the Nursery to discuss any safeguarding concerns. Whilst generally speaking the Designated Safeguarding Lead (or deputy) would be expected to be available in person, it is a matter for individual Nurseries, working with the Designated Safeguarding Lead, to define what “available” means and whether in exceptional circumstances availability via phone and or Skype or other such mediums is acceptable.

It is a matter for individual Nurseries and the Designated Safeguarding Lead to arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.

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<sup>3</sup>Section 17(10) Children Act 1989: those unlikely to achieve a reasonable standard of health and development without local authority services, those whose health and development is likely to be significantly impaired without the provision of such services, or disabled children.

## Appendix 2: Designated Lead Additional Responsibilities for LAC if Applicable

The broad areas of responsibility for the LAC are:

### 1. General

The Designated Teacher is expected to:

- a. Take lead responsibility, ensuring that their personal, emotional needs are prioritised by providing strategic leadership across the Nursery.
- b. Act as the central point of contact in the Nursery, ensuring the Nursery has appropriate arrangements in place to support children and minimize any disruption to learning.
- c. Work with the team to promote the education of LAC, ensuring a whole-Nursery culture where the personalised learning needs of every looked-after child matters.
- d. Take lead responsibility for ensuring Nursery staff understand the ways in which LAC's learning  
Maybe affected and how the Nursery supports the educational achievement of these children.
- e. Take lead responsibility for the development and implementation of LAC's personal education  
plans (PEPs) in partnership with others.
- f. Ensure that any safeguarding concerns regarding LA Care quickly and effectively responded to.
- g. Liaise with the SENCo to identify and support the SEND needs of LAC, and understand how to access further assessment and support where necessary.
- h. Respond appropriately to disclosures or concerns relating to the well being of a LAC child.
- i. Keep detailed, accurate and secure written records of arrangements, and any concerns, for LAC.
- j. Monitor LAC children at risk of harm or those that have been subjected to harm, providing support and ensuring their welfare.
- k. Contribute to the development and review of whole-Nursery policies and procedures in relation to LAC.

### 2. Fostering a culture of inclusivity

Promoting a culture in which looked-after and previously looked-after children:

- a. Can discuss their progress and be involved in setting their own targets, have their views taken seriously, and are supported to take responsibility for their own learning;
- b. are prioritised in any selection of children who would benefit from one-to-one tuition, and that they have access to academic focused study support;
- c. are encouraged to participate in Nursery activities and in decision making within the Nursery and the care system;
- d. believe they can succeed and aspire to further and higher education or highly skilled jobs;
- e. can discuss difficult issues (such as SEN, bullying, attendance) in a frank manner with a sympathetic and empathetic adult.

### **3. Personal Education Plans**

- a. Work closely with other teachers to assess children's educational needs and ensure PEPs are created without delay.
- b. Ensure that PEPs are effective in supporting everyone to help the looked-after child to make good educational progress.
- c. Discuss with the child the best way for them to make progress and involve any relevant teachers in the discussion to arrange effective provision across the whole curriculum.
- d. Take responsibility for reviewing PEPs before the statutory review, ensuring they are up-to-date and contain any new information, including whether agreed provision is being delivered.
- e. Ensure PEPs are clear about what has or has not been taken forward, noting what resources may be required to further support the child and how these resources may be secured.
- f. In respect of children with SEND, ensure that their PEPs work parallel to their education, health and care (EHC) plan.

### **4. Liaison**

Work with services externally and internally to provide the required support for all Looked After Children. For example, intervention worker within Nursery, Looked After Children's Educational Services (LACES), virtual Nursery heads (VSHs) and Police etc.

Contribute towards raising parents' awareness of the child premium plus and other support for

LAC and encourage their involvement in deciding how the funding is used to support their child.

Working directly with looked-after and previously looked-after children and their carers, parents or guardians to:

- a. Promote good home-Nursery links;
- b. Support progress by paying particular attention to effective communication with carers, parents or guardians;
- c. Ensure carers, parents or guardians understand the potential value of one-to-one tuition and are equipped to engage with it at home;
- d. Ensure carers, parents or guardians are aware of how the Nursery teaches key skills such as reading and numeracy; and
- e. Encourage high aspirations and working with the child to plan for their future success and fulfilment.

### **5. Being a source of advice for teachers**

- a. Take lead responsibility for ensuring all staff members have strong awareness, training and skills relating to the specific needs of LAC and how to support them, e.g. with regards to attendance, homework and behaviour.



- b. Ensure all staff members have high expectations of LAC's learning and set targets to promote educational progress.
- c. Promote attachment and trauma awareness between staff members, ensuring they are aware of the emotional, psychological and social effects of loss and separation from birth families and how this impacts children's behaviour.
- d. Ensure all staff members understand the importance of viewing LAC as individual children rather than a group of children, and that they are treated equally.
- e. Ensure staff members are aware of the training opportunities that are available to them.
- f. Maintain an appropriate level of confidentiality whilst at the same time liaising with relevant professionals.
- g. Represent the Nursery at meetings of designated leads and circulate the outcomes to staff members.
- h. Ensure staff members receive frequent updates regarding particularly vulnerable LAC.
- i. Work with other institutes to ensure that the child's transition to the next stage in their education is as smooth as possible, confirming that any other appropriate institutes have all the necessary documents.
- j. Where necessary, securely transfer child's personal files, as well as those containing child protection issues, to other educational establishments, ensuring that confirmation of receipt is obtained.

## Appendix 3: Safe working practices

### 1. Propriety and behaviour

All staff are expected to:

- a. Set high expectations and challenging targets for all children
- b. Promote fundamental British values, Including democracy, the rule of law, freedom of religion, individual liberty, freedom of speech, freedom of thought, freedom of association and mutual respect and tolerance of different faiths and beliefs, fairness, social responsibility, liberty and equality for all
- c. Ensure that they set expectations of the highest standards of behavior and conduct within Nursery, regardless of whether in class or beyond, and challenge activities by any child that maybe considered to be of an inappropriate nature.

All staff are expected to refrain from:

- a. Making inappropriate (innuendo) remarks to, or about, a child
- b. Discussing personal relationships with or in the presence of children
- c. Discussing a child's personal relationships in inappropriate settings or contexts
- d. Making unprofessional personal comments which scapegoat, demean or humiliate, or might be interpreted as such.

All staff are aware that inappropriate behaviour towards children is unacceptable and that their conduct towards children must be beyond reproach.

In addition, staff should understand that, under the Sexual Offences Act 2003, it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of Management, even if the relationship is consensual. This means that any sexual activity between a member of the Nursery staff and a child under 18 may be a criminal offence, even if that child is over the age of consent.

### 2. Dress and appearance

All staff are expected to wear clothing which:

- a. Promotes a positive and professional image
- b. is appropriate to their role
- c. is not likely to be viewed as offensive, revealing or provocative
- d. does not distract, cause embarrassment or give rise to misunderstanding
- e. is absent of any political or otherwise contentious slogans
- f. is not considered to be discriminatory.

### 3. Rewards and gifts

All staff are expected to:

- a. ensure that gifts received or given in situations which may be misconstrued are declared immediately
- b. generally, only give gifts to an individual child as part of an agreed reward system

- c. where giving gifts other than as above, ensure that these are of an insignificant value and given to all children equally
- d. ensure that the selection processes for gifts and rewards are fair, transparent and (wherever practicable) are undertaken by more than one member of staff.

#### **4. Infatuations**

All staff are expected to report any indications (verbal, written or physical) that suggest a child may be infatuated with a member of staff. This must be reported to a senior leader.

#### **5. Photography, videos and other creative arts**

All staff are expected to:

- a. Refrain from making any visual recordings of children (still or moving) without the prior consent of a senior leader
- b. Seek parental consent for a photograph to be taken or published
- c. Ensure that the storage and distribution of such images is approved by senior leaders and care is taken to avoid illicit use of the images
- d. Ensure that all images are available for scrutiny in order to screen for acceptability
- e. Be able to justify images of children in their possession
- f. Avoid making images in one-to-one situations
- g. Refrain from taking images of children using personal mobile phones.

#### **6. Social contact**

All staff are expected to:

- a. Always approve any planned social contact with children or parents with a senior leader
- b. Advise a senior leader of any (unplanned) social contact they have with a child which might cause concern
- c. Report and record any situation which they feel might compromise the Nursery or their own professional standing
- d. Refrain from sending personal communication to children e.g. letters and cards unless agreed with a senior leader.

#### **7. Communication using technology**

All staff are expected to refrain from:

- a. Passing personal contact details to children including email, home or mobile phone numbers unless the need to do so is agreed with a senior leader
- b. Any communication with children which may be construed as grooming
- c. Making any visual recordings of children (still or moving) without the prior consent of a senior leader
- d. Using any personal equipment when communicating with children.
- e. For the purposes of exchanging coursework or homework only, it is permitted for staff to exchange their Nursery email address with children. However, any

correspondence whilst using Nursery email must be very cautious and perfunctory to avoid any misconstruing.

## **8. Safeguarding whilst using ICT**

In using ICT in lessons, the following safeguards will be introduced by the Nursery:

- a. Security software will be installed on all PCs, laptops and the network to filter inappropriate internet sites
- b. Security software will prevent access to social networking sites
- c. anti-viral software will be installed on all PCs, laptops and the network and renewed as required
- d. the use of the internet will be monitored using security software to ensure effective safeguarding within and beyond the Nursery
- e. all network access points will be placed in a safe, adequately monitored area to prevent unauthorized access and physical tampering
- f. all wireless access points will be secured using administrative passwords.

In using ICT (laptops and PCs), all staff are expected to:

- a. communicate the expectations in the Acceptable Use of ICT agreement to all children
- b. communicate a clear, well-defined purpose to the use of the internet during the course of the lesson
- c. monitor the use of ICT during the lesson to ensure effective safeguarding
- d. report any access by children, in advertent or deliberate, to unauthorized or inappropriate sites immediately to their line manager and to the ICT Technician
- e. be vigilant for signs of, and report, any instances of cyber-bullying (more information is provided
- f. in the Nursery's Anti-Bullying Policy)
- g. take extreme care to ensure that children are not exposed to inappropriate or indecent images
- h. ensure that they do not use Nursery equipment to access any inappropriate or indecent images themselves.

In the event of indecent images being found on a computer, staff must report the incident to a senior leader as soon as possible.

## **9. Physical contact**

All staff are expected to:

- a. Refrain from touching children in a way which may be considered as indecent or for the gratification of the adult or the child
- b. Avoid any gratuitous or unnecessary physical contact with children (this includes horseplay, tickling or stroking the head etc)
- c. Be prepared to explain actions and accept that all physical contact is open to scrutiny
- d. Always encourage children, where possible, to complete self-care tasks independently
- e. Avoid using physical contact as a reward (this includes hugs and pats on back etc)
- f. Ensure that physical contact is never secretive or represents a misuse of authority.

## **10. Behaviour management and physical restraint**

All staff are expected to:

- a. Try to defuse situations before they escalate
- b. Ensure all rewards and sanctions are within the Nursery's agreed 'Behaviour Policy'
- c. Ensure parents are informed of all sanctions
- d. Avoid the use of sarcasm or demeaning and insensitive comments towards children.

Please see the Behaviour Policy for full details on behavior management strategies upheld by the Nursery.

Some situations may give rise to the need for physical intervention. However, Nursery staff must ensure that they have considered the child's safeguarding and welfare when restraint is used especially on a child with SEND. The decision on whether or not to physically intervene is down to the professional judgement of the staff member concerned and should always depend on the individual circumstances. If an alternative method of control and restraint is possible then these methods should be used first. If physical contact is the only suitable method then the use of 'reasonable force' is permitted.

Force is usually used either to 'control' or 'restrain'. This can range from guiding a child to safety by the arm through to more extreme circumstances such as breaking up a fight or where a child needs to be restrained to prevent violence or injury. The key point to always remember is that 'reasonable in the circumstances' means using no more force than is needed for that situation.

The following list is not exhaustive but provides some examples of situations where reasonable force can be used:

- a. to remove disruptive children from the classroom where they have refused to follow an instruction to do so
- b. to prevent a child behaving in a way that disrupts a Nursery event or a Nursery trip or visit
- c. to prevent a child leaving the classroom where allowing the child to leave would risk their safety or lead to behavior that disrupts the behavior of others
- d. to prevent a child from attacking a member of staff or another child, or to stop a fight in the playground
- e. to restrain a child at risk of harming themselves through physical outbursts.

Under no circumstances should staff use force as a punishment.

Please see the 'Use of Reasonable Force Policy' for full guidance.

## **11. One-to-one situations**

All staff should:

- a. Avoid meeting with children in remote, secluded areas of the Nursery

- b. Ensure that there is visual access and/or an open door in one-to-one situations
- c. Inform other staff of the meeting before hand, assessing the need to have them present or close by
- d. Avoid anyone-to-one situations with children that may result in an interpretation of secrecy
- e. Always report any situation where a child becomes distressed or angry to a senior leader.

## **12. Intimate care**

Some children may require intimate care—this may include support with toileting or removing soiled clothing. In supporting such children, staff should:

- a. Take account of the 'Supporting Children with Medical Conditions' Policy
- b. Adhere to a care plan agreed with parents for children requiring intimate care
- c. Encourage children to act as independently as possible
- d. Ensure that another member of staff is in close vicinity if intimate care is required
- e. Record any instances of intimate care, justifying the need for any variations from the care plan
- f. Share the need for intimate care with parents, if irregular or unexpected.

## **13. Toileting, Showering and Changing**

General Principles:

- a. suitable toilet and washing facilities should be provided for the sole use of children
- b. separate toilet facilities for boys and girls aged 8 years or over should be provided except where the toilet facility is provided in a room that can be secured from the inside and that is intended for use by one child at a time
- c. where separate facilities are provided for children who are disabled, they may also be used by other children, staff, supply staff, volunteers and visitors, whether or not they are disabled
- d. as far as possible, members of staff should supervise or assist children of the same sex
- e. where ever possible designated single sex changing room or areas should be used. If this is not possible and boys and girls change together, in a classroom for example, consideration should be given to utilizing furniture or screens to provide discrete areas.

All staff are expected to:

- a. avoid any physical contact when children are in a state of undress
- b. avoid any visually intrusive behavior and, where there are changing rooms, announce their intention of entering
- c. avoid remaining in the room unless a child's needs require it (judgment will be based on the age and development needs of the children)
- d. take into account the needs of children from different religions, beliefs and cultural backgrounds.

Where children need assistance staff are expected to:

- a. take account of the 'Intimate Care' Policy held within the 'Supporting Children with Medical Conditions' Policy
- b. encourage children to be as independent as possible, giving verbal help before offering assistance
- c. provide assistance openly, not out of sight of others.

All staff must not:

- a. change in the same place as children
- b. shower with children.

When off-site showering and changing arrangements are in place:

- a. the above guidance will apply
- b. children will not share changing/toilet facilities with members of the public
- c. where changing facilities are shared with children from another Nursery, adults from both Nurseries will make appropriate arrangements and properly risk assess together.

#### **14. Visual access to classrooms**

All staff are expected to ensure that there is always visual access and/or an open door to their classrooms.

Where staff feel the need to cover the visual access to their door temporarily, they must be able to justify doing so on child protection grounds and must ensure that there is a second member of staff in the classroom at the time.

#### **15. Administration of medication**

In dispensing medication to children, staff should:

- a. Take account of the Nursery's 'Supporting Children with Medical Conditions' Policy
- b. Ensure that they are authorized to dispense medication
- c. Ensure that parental consent has been secured and recorded
- d. Ensure that all medicines are stored in a locked cupboard, or if refrigerated, in an area not accessible to children
- e. Record the storage, dispensing and disposal of medication
- f. Not force a child to take medicine if they refuse to do so- in such a case, parents should be informed immediately, and emergency services called if needed.

Staff must also ensure that all personal medication is stored securely in a locked area at all times.

#### **16. Transporting children in staff cars**

Children should only be transported in staff cars as a matter of last resort– where alternative modes of transport are unavailable and only when the child is not distressed in anyway.

Normally, this will mean when taking children home–trips should not be planned with the intention of using staff vehicles for transport. In transporting children using a staff vehicle:

- a. the consent of a senior leader should be secured on each occasion
- b. the member of staff should travel with a colleague, if at all possible
- c. the member of staff should have 'Business' car insurance on their vehicle
- d. the member of staff should ensure that the car is roadworthy
- e. the child should sit at the back of the car–and be instructed to wear a seat belt.

## Appendix 4: Safeguarding concern form

### Safeguarding Concern Form

CONFIDENTIAL

#### PART 1: INTERNAL NOTIFICATION OF CHILDPROTECTION/WELFARE CONCERN TO THE DSL

Name(s) of child:		
D.O.B.		
Class/Year		
<b>What is the nature of your concern?</b>		
<ul style="list-style-type: none"> <li>- What are you most concerned about? i.e. physical, sexual, emotional abuse or neglect, self-harm, bullying, sexual exploitation, sexualized behaviour, honour-based violence/ forced marriage, e-safety issues, radicalisation, other...</li> <li>- Have you had any previous concerns about this child? If so, what, when, action?</li> <li>- <i>If you have received a 'disclosure' from or about a child please complete Part2 overleaf</i></li> </ul>		
Are there any injuries of concern?	Yes/No	
Describe injury and complete 'Part3: Body Map' to show where the injury is and its approximate size		
<b>Any action already taken</b>		
Signed		
Name		
Job title		
Time/Date		
<i>If you have received a 'disclosure' from or about a child please complete Part2 overleaf</i>		



## PART 2: RECORD OF 'DISCLOSURE' FROM / ABOUT A CHILD

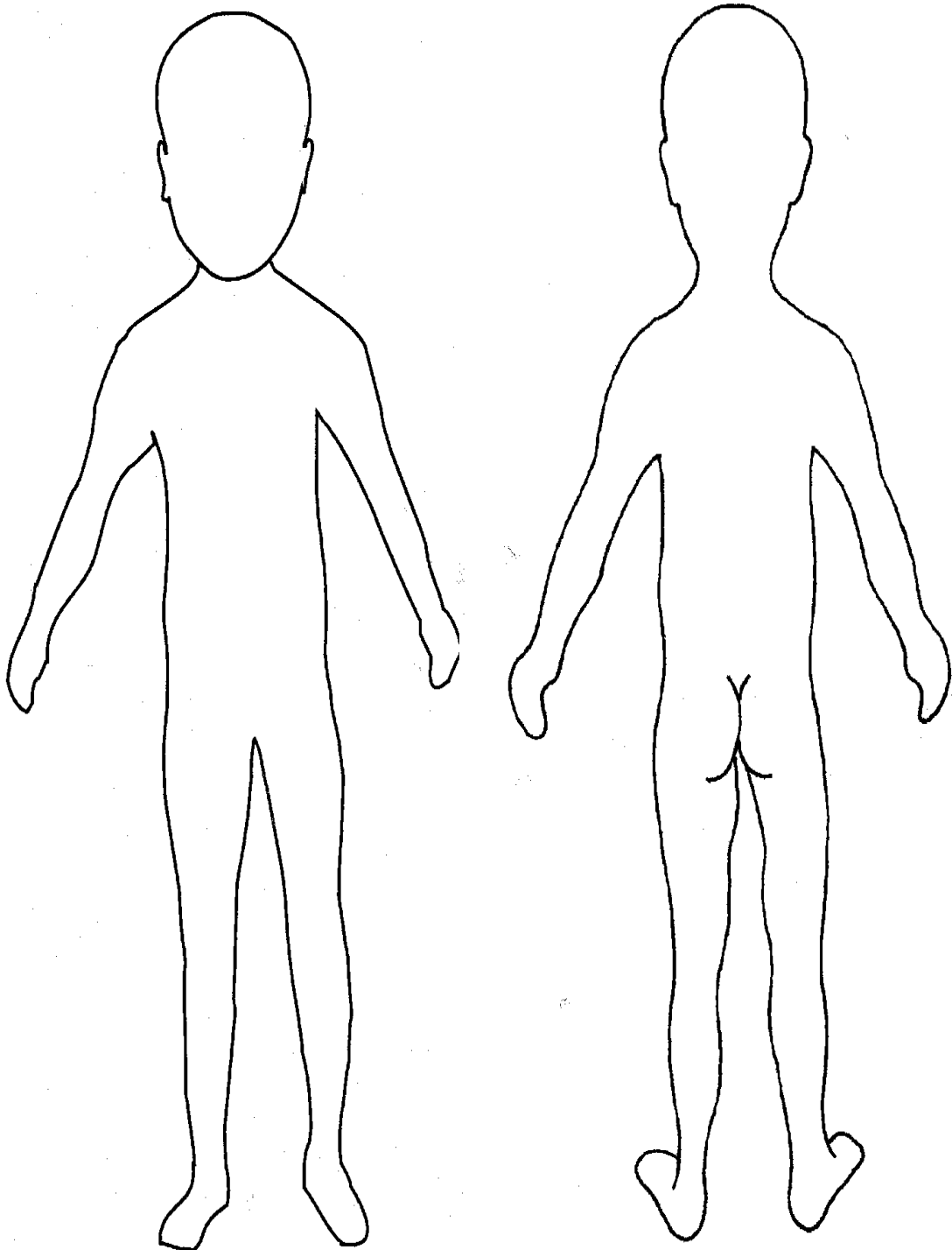
*\*It is not advisable to try and complete this record at the time. The important thing is to listen actively and carefully and reassure the child.*

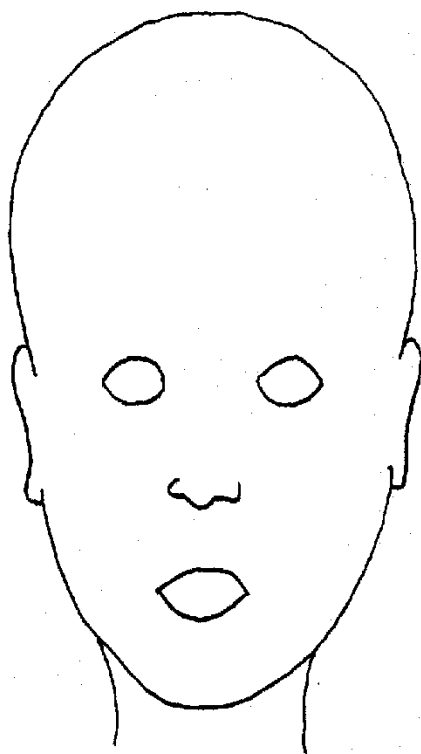
<b>Name of person to whom the 'disclosure' has been made</b>	
<b>Position/ relationship with child</b>	
<b>How did the 'disclosure' come about i.e. when and where?</b>	
<b>Who was present when the Disclosure was made?</b>	
<b>Summary of information disclosed</b>	

<b>WHO is said to be involved</b>	
<b>WHAT is said to have happened /be happening?</b>	
<b>WHERE is this said to have happened / be happening?</b>	
<b>WHEN is this said to have happened/be happening i.e. duration, most recent occasion etc?</b>	
<b>WHO else may have witnessed what happened?</b>	
<b>HOW and where is the child now?</b>	
<b>Continuation sheet added</b>	YES/ NO
<b>Note:</b> <ul style="list-style-type: none"> <li>- Differentiate clearly between fact, opinion, interpretation and stick to the facts as you understand them wherever possible.</li> <li>- If you have used quotes please ensure that they are accurate.</li> <li>- Make a note of any open questions asked or minimal prompts used.</li> <li>- Any notes made 'at the time' should be attached to this pro-forma; these maybe required as evidence if the matter goes to court.</li> </ul>	

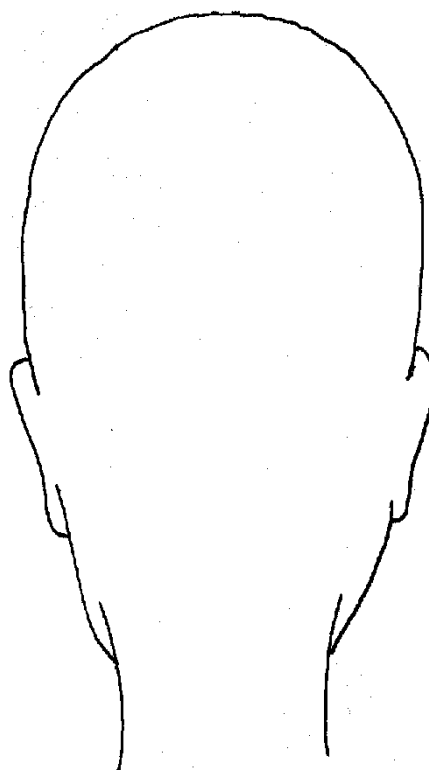
<b>Signed</b>	
<b>Name</b>	
<b>Job title</b>	
<b>Time/Date</b>	

### PART 3: BODYMAP

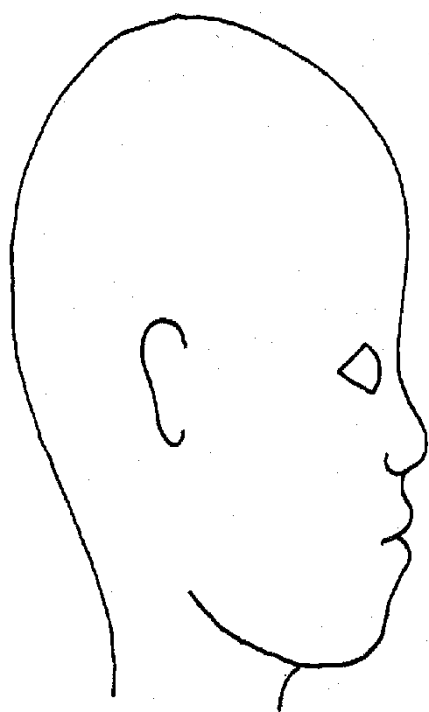




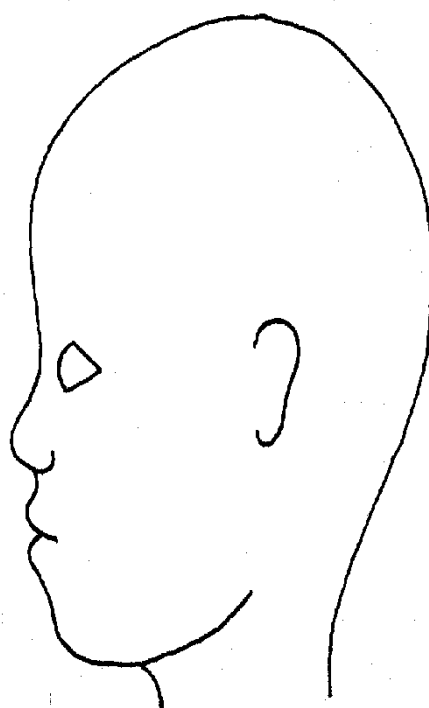
FRONT



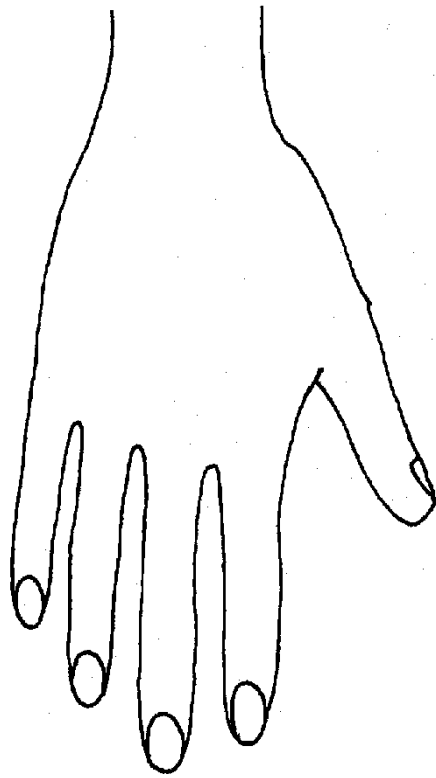
BACK



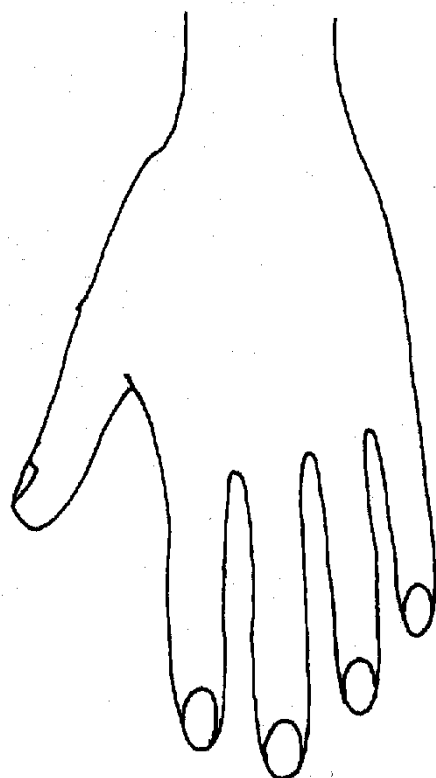
RIGHT



LEFT

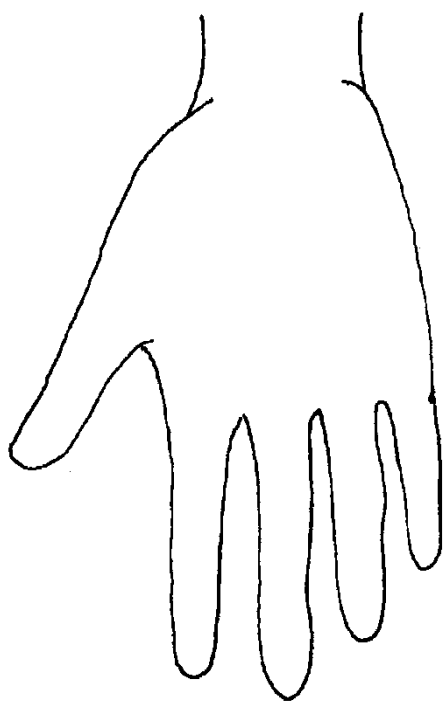


R



L

BACK

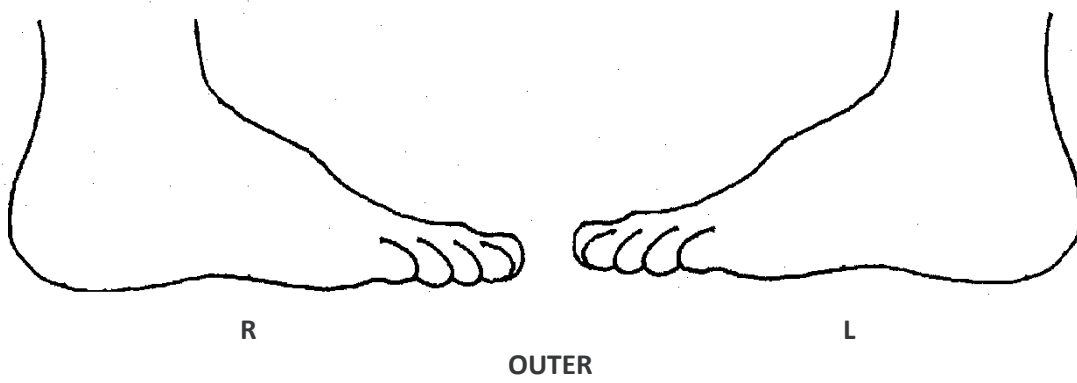
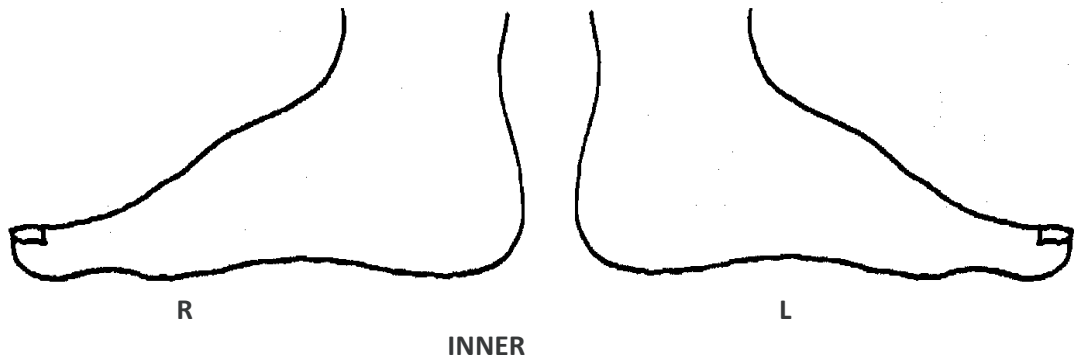
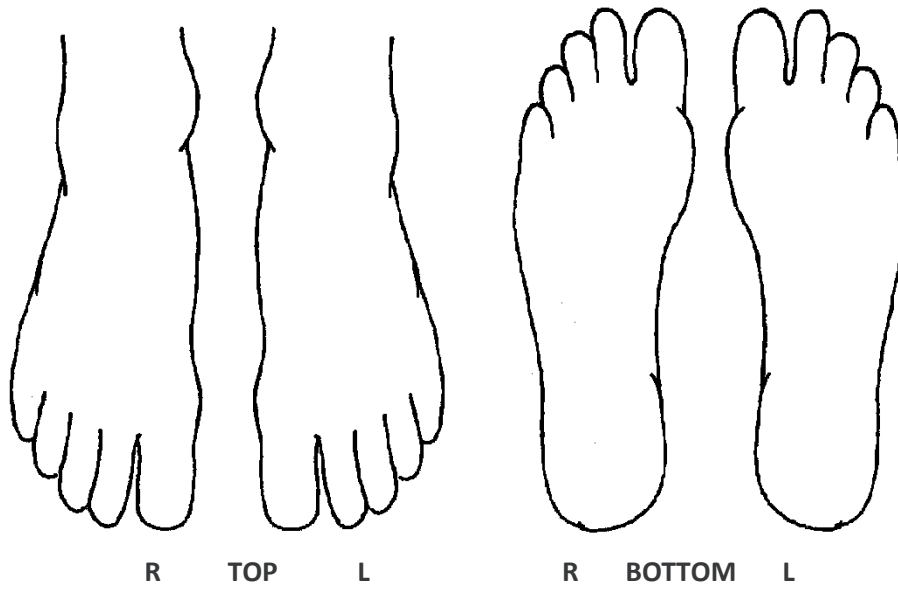


R



L

Front



## PART 4: ACTION TAKEN BY DSL

<b>Time and date information received by DSL and from whom</b>	Time	
	Date	
	From	
<b>Action taken (internal &amp; external advice sought, referral to SENCO, Attendance Officer, Children's Social Care, continued monitoring etc)</b>  Include time, dates, names, who information shared with and when etc		
<b>Parents informed and reasons?</b>	Yes/No	
<b>Child Child Protection File created?</b>	Yes/No	
<b>Front Sheet populated?</b>	Yes/No	
<b>Chronology Record started/updated</b>	Yes/No	
<b>Signed by DSL</b>		
<b>Name</b>		
<b>Time/Date</b>		

## Appendix 5: Child protection file—front sheet

### Child Protection File

#### Front Sheet

<b>Child name</b>			
<b>Date of birth</b>			
<b>Any other name by which child is known</b>			
<b>Home address</b>		<b>Current address (if different)</b>	
<b>Contact tel no.</b>		<b>Contact tel no.</b>	
<b>Family members i.e. parents/ carers/ siblings</b>			
<b>Name</b>	<b>Relationship</b>	<b>Address</b>	<b>Nursery Details</b> (in the case of siblings)
<b>Date file started</b>			
<b>Are records held in Nursery relating to other connected children?</b>			
<b>Contact details of other professionals</b>			
<b>Name</b>	<b>Agency</b>	<b>Address</b>	



## Appendix 6: Removal of information record

### Child Protection File

#### Removal of Information Record

<b>Child Information</b>	
Child name	
Date of birth	
<b>Removal of Information</b>	
Date documents or complete file removed	
Name and role of person removing documents or complete file	
Signature of person removing documents or complete file	
List documents removed (or complete file)	
Reason for removal	
<b>Replacement of Information</b>	
Date documents or complete file replaced:	
Were all documents replaced?	Yes /No
If all documents are NOT replaced please record which documents have not yet been replaced, along with the location of such documents and reason for such documents not having been replaced.	
Name and role of person replacing documents or complete file	
Signature of person replacing documents or complete file	

Appendix 7: Child protection file—chronology of significant events

Child Protection File

Chronology of Significant Events

Child name	
Date of birth	

Date of event	Date info received/ recorded	Significant event	Source of information	Actions taken and outcomes (include advice sought, dates, names, who information shared with and when etc)	Parents informed Y/N and reasons	Recorded by (full name and job title)

## Appendix 8: Record of child protection file transfer

### Record of Child Protection File Transfer

#### PART 1: TO BE COMPLETED BY SENDING/TRANSFERRING NURSERY

Name of child	
D.O.B.	
Name of Nursery sending CP File	
Address of sending Nursery	
Date file sent	
Name of Manager / Designated Safeguarding Lead	
Method of delivery	
Signature	

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#### PART 2: TO BE COMPLETED BY RECEIVING NURSERY

Name of Nursery/college Receiving file	
Address	
Date received	
Name of Manager / Designated Safeguarding Lead receiving file	
Had the file been tampered within transit?	
Signature	

## Appendix 9: Staff safeguarding declaration

# ANNUAL SAFEGUARDING DECLARATION

1. I have received and read the Nursery's Safeguarding (Child Protection) Policy, including the appendices.
2. I have received and read Part1 of the DfE guidance 'Keeping Children Safe in Education', (DfE2021).
3. I have received and read the Staff Code of Conduct.
4. I have completed the Nursery's safeguarding training, including PREVENT training.
5. I understand that supplementary safeguarding guidance is available at [www.gov.uk](http://www.gov.uk)
6. I agree to adhere to the protocols set out in the Nursery's Safeguarding (Child Protection) Policy, the Staff Code of Conduct and the DfE guidance 'Keeping Children Safe in Education', (DfE2021).

**Note:** *Palm Tree Nursery takes its responsibility to safeguard children very seriously. If any concerns regarding conduct contrary to the Safeguarding (Child Protection) Policy come to our attention, appropriate action will be taken.*

Print name: .....

Sign: .....

Date: .....

## Appendix 10: Safeguarding Risk Assessment – Allegations Against Staff

The purpose of the safeguarding risk assessment is to identify:

- If there is any risk to children, young people or adults with whom the employee has contact with, in a position of Management
- How any risk identified should be best managed
- Whether the employee is safe to continue in their role
- Any future implications should the employee continue in their role

### 1. BACKGROUND

Name:	
Designation:	
Establishment:	
Date DBS Checked:	
Outcome of DBS Check:	

1. Are any children present in the household of the employee: (Yes/No)

If yes, please provide gender and age details:

Gender	Age

2. Date of incident: \_\_\_\_\_
3. Context in which the alleged incident took place:

## **2. RISK ASSESSMENT FACTORS**

On the basis of the evidence available, professional judgement and experience, the level of risk should be assessed as follows for the appropriate risk assessment factors below:

### **Low risk (L):**

No safeguarding action is required and/or safeguarding issues have been addressed.

### **Moderate risk (M):**

Safeguarding Protection Plan is required to manage the risk and/or remains in place.

### **High risk (H):**

Protection Plan requires implementation. Legal action is being taken. The behaviour is persistent and/or deliberate

### **Severe risk (S):**

Life may be in danger, risk of major injury or serious physical or mental ill harm. The incidents are increasing in frequency and/or severity.

Risk Assessment Factor:	Risk L/M/H/S
<p>What is the specific allegation/offences?</p> <p><i>Assess the risk based on the gravity of the allegations or offence</i></p>	
<p>Is the matter being dealt with by another professional agency e.g. Police or Local Authority Safeguarding Officer?</p>	<p>This question does not need to be rated.</p>
<p>If the matter is currently being dealt with by another agency, what is the current position of the investigation or intervention?</p>	<p>This question does not need to be rated.</p>
<p>How severe is the harm (threatened or inflicted) and are there any children and/or other vulnerable adults involved?</p> <p><i>Assess severity of harm threatened or inflicted</i></p>	
<p>Is there evidence to suggest that the harm is likely to continue or escalate?</p> <p><i>Assess the risk based on the likelihood of the harm continuing or escalating</i></p>	
<p>Is there evidence to suggest that the harm was premeditated?</p> <p><i>Assess the likelihood of the harm involving premeditation</i></p>	
<p>Is there evidence to suggest that the harm was accompanied by sustained threats or coercion?</p> <p><i>Assess the likelihood of the harm involving threats or coercion</i></p>	
<p>Is there a pattern of history for this type of behaviour?</p> <p><i>Assess the level of risk based on previous behaviour, frequency and severity</i></p>	

What is the future risk of harm posed to the victim?	
What is the risk of harm posed to other children or adults?	
<i>What is the likelihood of harm to the child or adults</i>	
Have there been any previous concerns or complaints?	
<i>Assess the level of risk based on previous history, frequency and seriousness of issues</i>	
What has been the impact on the employee's health and wellbeing?	
<i>What is the level of risk based on the employee's current health</i>	
Is the employee receiving any medical support? If not, is this intended?	
<i>Assess the level of risk incurred from medication or existing treatment plan</i>	

### 3. RISK ASSESSMENT SUMMARY

Overall assessment of risks identified, including the risk to others:

Views and recommendations of professional agency e.g. Police/Local Authority or Safeguarding Officer:
Views and recommendations of Risk Assessor:
Views of Individual:
Overall Risk/ (Low/Moderate/High/Severe):



#### 4. AGREED ACTIONS

Consideration should be given to appropriate actions that will support the reduction of risk, forexample, training and development, supervision, peer support alternative duties and access to occupational health services.

Action	Desired outcome	Timescale	Responsible Officer

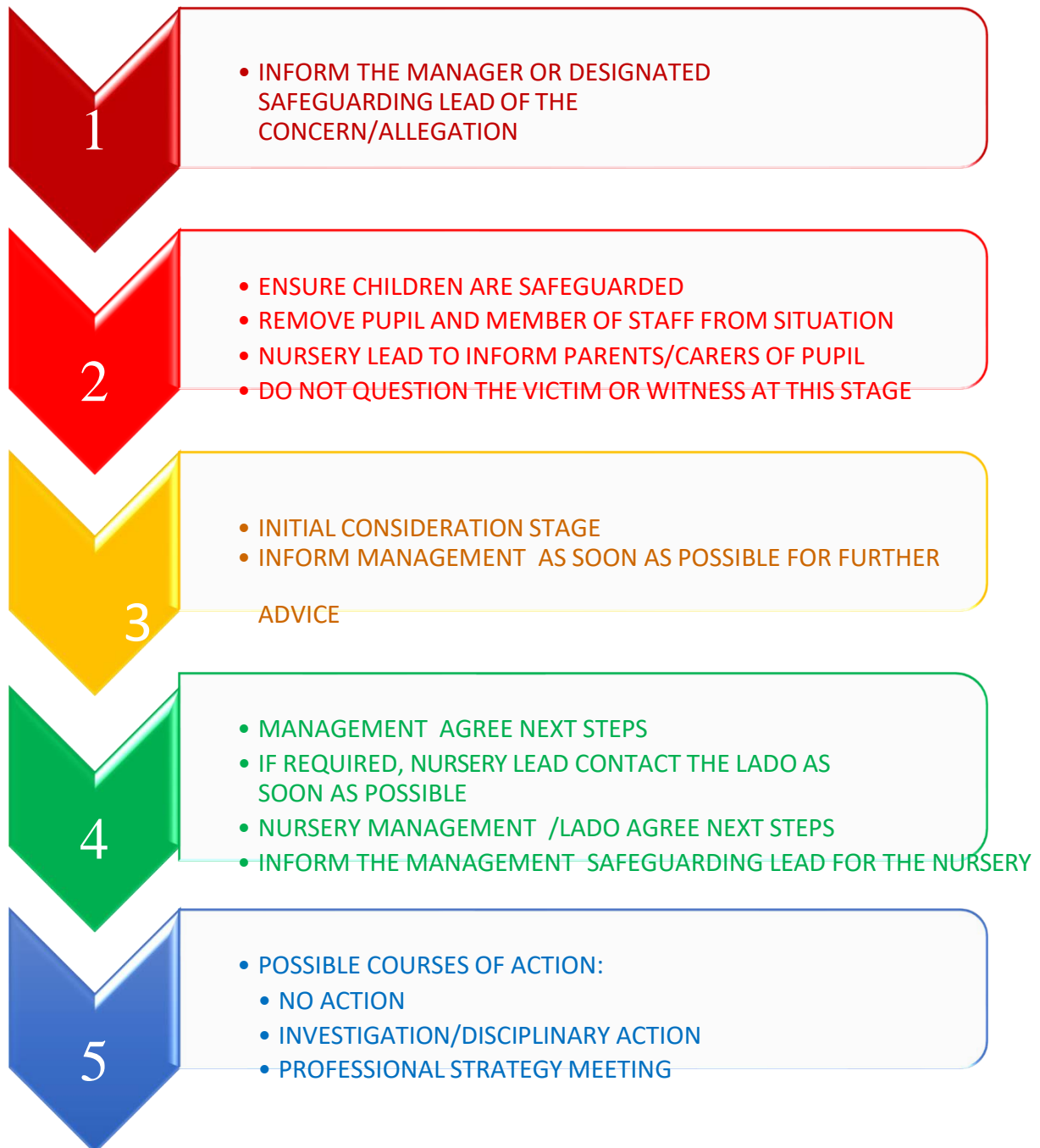
Risk Assessor: \_\_\_\_\_ Signature: \_\_\_\_\_

Employee Name: \_\_\_\_\_ Signature: \_\_\_\_\_

Date of Risk Assessment: \_\_\_\_\_

Date of Review: \_\_\_\_\_

## Appendix 11: Safeguarding incident involving a member of staff and pupil in nursery



## **Appendix 12: Safeguarding procedures in the event of a partial or full nursery closure**

### **Supporting children in Nursery**

Nursery will continue to be a safe space for all children to attend and flourish.

The Manager will ensure that appropriate staff are on site and that staff to pupil ratios are appropriate, to maximise safety.

Where the Nursery has concerns about the impact of the absence of staff, such as the Designated Safeguarding Leads.

Following a Nursery closure, it is recognised that staff, parents/carers and children may experience some degree of anxiety about the return to Nursery.

The Nursery will plan to develop an inclusive culture so that everyone returns to a positive working environment. Nursery will refer to the Management guidance on mental health and behaviour to help identify children who might need additional support, and to put this support in place.

Pastoral staff will be available for children and will be given the time to provide support as required.

The Nursery will continue to signpost children and parents/carers, to a range of appropriate sources of support, in Nursery and beyond Nursery.

### **Reporting a concern**

The Nursery will continue to use its normal referral processes for any children where it has concerns, in line with the Management's Safeguarding and Child Protection Policy.

The Nursery will continue to use its normal referral processes for any adults working with children where it has concerns, in line with the Management's Safeguarding and Child Protection Policy.

### **Attendance recording and absence monitoring**

For appropriate coding of pupils, the Nursery will follow guidance as set out by the Management.

Absence procedures for phone calls and home visits will be followed in line with the Safeguarding guidance for Nurseries in the event of a Nursery closure Standard Operating Procedure March 2020.

### **Safeguarding training and induction**

The DSL will communicate with staff any new local arrangements, so they know what to do if they are worried about a child.

All staff will maintain the view that 'it could happen here' and report any concern to the DSL or Deputy DSL.

### **Recruitment**

It remains essential that people who are unsuitable are not allowed to enter the children's workforce or gain access to children. When recruiting new staff, the Nursery will continue to follow the safer recruitment processes in line with the Management's Recruitment and Selection Policy, Safeguarding

Policy, and including, as appropriate, relevant sections in part 3 of Keeping children safe in education (2021).

Where new staff are recruited, or new volunteers enter the Nursery, they will continue to be provided with a safeguarding induction.

### **Online safety in Nursery's**

The Nursery will continue to provide a safe environment including online. This includes the use of an online filtering system.

Where children are using computers in Nursery, appropriate supervision will be in place.

### **Online safety away from Nursery**

It is important that all staff who interact with children, including online, continue to look out for signs that a child may be at risk. Any such concerns should be dealt with as per the Safeguarding and Child Protection Policy and where appropriate referrals should still be made to children's social care and as required, the police.

The Nursery will ensure that there is a risk assessment in place relating to remote learning, which covers relevant aspects of safeguarding.

All staff are required to uphold the code of conduct that specifies professional expectations including language, behaviour and dress relating to online teaching.

All pupils are required to uphold the code of conduct specifying expectations of language, behaviour and dress relating to online learning.

All parents are required to uphold the code of conduct that includes safeguarding, including the expectation that they will not share material relating to their children's learning on social media.

Pupils will generally be taught in classes or groups. Occasionally, one-to-one teaching may be required. If this is the case, an individual risk assessment will be completed by the Nursery focused on keeping both the pupil and the staff member safe.

The Nursery will reassure themselves that any teaching/learning software and/or platforms are suitable and raise no privacy issues.

Any concerns about aspects of conduct raised in lessons by staff or pupils must be referred to the Manager.

### **Pupil behaviour**

Where the Nursery receives a report of bullying, racism or peer-on-peer abuse, it will follow the principles as set out in line with the Management's Safeguarding and Child Protection and Behaviour policies.

The Nursery will listen to and work with the young person, parents/carers and any multi-agency partner required to ensure the safety and security of that young person.

Concerns and actions must be recorded on the safeguarding platform and appropriate referrals made.

### **Support from the management**

The Safeguarding Team will continue to provide support and guidance as appropriate to enable the DSL to carry out their role effectively.

## **Supporting children in nursery**

Nursery will continue to be a safe space for all children to attend and flourish.

The Manager will ensure that appropriate staff are on site and that staff to pupil ratios are appropriate, to maximise safety.

Where the nursery has concerns about the impact of the absence of staff, such as the Designated Safeguarding Lead or first aiders, the Manager will discuss them immediately with their Management.

Following a nursery closure, it is recognised that staff, parents/carers and children may experience some degree of anxiety about the return to nursery.

The nursery will plan to develop an inclusive culture so that everyone returns to a positive working environment. Nursery will refer to the Management guidance on mental health and behaviour to help identify children who might need additional support, and to put this support in place.

Pastoral staff will be available for children and will be given the time to provide support as required.

The nursery will continue to signpost children and parents/carers, to a range of appropriate sources of support, in nursery and beyond nursery.

## **Reporting a concern**

The nursery will continue to use its normal referral processes for any children where it has concerns, in line with the Management's Safeguarding and Child Protection Policy.

The nursery will continue to use its normal referral processes for any adults working with children where it has concerns, in line with the Management's Safeguarding and Child Protection Policy.

## **Attendance recording and absence monitoring**

For appropriate coding of pupils, the nursery will follow guidance as set out by the Management.

Absence procedures for phone calls and home visits will be followed in line with the Safeguarding guidance for nurseries in the event of a nursery closure Standard Operating Procedure March 2020.

## **Safeguarding training and induction**

The DSL will communicate with staff any new local arrangements, so they know what to do if they are worried about a child.

All staff will maintain the view that 'it could happen here' and report any concern to the DSL or Deputy DSL.

## **Recruitment**

It remains essential that people who are unsuitable are not allowed to enter the children's workforce or gain access to children. When recruiting new staff, the nursery will continue to follow the safer recruitment processes in line with the Management's Recruitment and Selection Policy, Safeguarding Policy, and including, as appropriate, relevant sections in part 3 of Keeping children safe in education (2021).

Where new staff are recruited, or new volunteers enter the nursery, they will continue to be provided with safeguarding induction.

### **Online safety in nursery's**

The nursery will continue to provide a safe environment including online. This includes the use of an online filtering system.

Where children are using computers in nursery, appropriate supervision will be in place.

### **Online safety away from nursery**

It is important that all staff who interact with children, including online, continue to look out for signs that a child may be at risk. Any such concerns should be dealt with as per the Safeguarding and Child Protection Policy and where appropriate referrals should still be made to children's social care and as required, the police.

The nursery will ensure that there is a risk assessment in place relating to remote learning, which covers relevant aspects of safeguarding.

All staff are required to uphold the code of conduct that specifies professional expectations including language, behaviour and dress relating to online teaching.

All pupils are required to uphold the code of conduct specifying expectations of language, behaviour and dress relating to online learning.

All parents are required to uphold the code of conduct that includes safeguarding, including the expectation that they will not share material relating to their children's learning on social media.

Pupils will generally be taught in classes or groups. Occasionally, one-to-one teaching may be required. If this is the case, an individual risk assessment will be completed by the nursery focused on keeping both the pupil and the staff member safe.

The nursery will reassure themselves that any teaching/learning software and/or platforms are suitable and raise no privacy issues.

Any concerns about aspects of conduct raised in lessons by staff or pupils must be referred to the manager

### **Pupil behaviour**

Where the nursery receives a report of bullying, racism or peer-on-peer abuse, it will follow the principles as set out in line with the Management's Safeguarding and Child Protection and Behaviour policies.

The nursery will listen to and work with the young person, parents/carers and any multi-agency partner required to ensure the safety and security of that young person.

Concerns and actions must be recorded on the safeguarding platform and appropriate referrals made.

### **Support from the Management**

The Management Safeguarding Team will continue to provide support and guidance as appropriate to enable the DSL to carry out their role effectively.





## Appendix 4: Safeguarding and Prevent Checklist

Please ensure all checks are complete.

Please be aware this is not an exhaustive list of all safeguarding measures.

No.	Key Actions	SLT	Comments
Safeguarding Policy, Training, Procedures and Record Keeping			
1.	Ensure Palm Tree Nursery's Safeguarding Policy is fully compliant with government guidance and includes the Prevent duty, Channel process and FGM Duty.		
2.	Ensure Palm Tree Nursery's Safeguarding policy is available on staff shared drive alongside the supplementary government guides.		
3.	Ensure the Safeguarding policy is uploaded to the website.		
4.	Ensure Palm Tree Nursery Safeguarding policy reflects the region, for example includes Prevent lead/local children's centre.		
5.	Ensure Parent Handbook outlines the nursery's approach to safeguarding.		
6.	Ensure there is evidence that Safeguarding Policy and KCSIE Part 1 has been disseminated to ALL staff at annual whole nursery training (e.g. registers, handouts).		
7.	Ensure Annual Safeguarding Declaration has been signed by all staff and all understand the responsibilities for safeguarding.		
8.	Retain evidence of any safeguarding updates shared with staff outside of the annual training (e.g. registers, handouts).		
9.	Ensure staff are aware of signs of abuse (including peer on peer and sharing nudes and semi-nudes), Prevent duty, and duty to report discovery of FGM.		
10.	Ensure staff aware of the early help process and their role within it.		
11.	Ensure staff are aware of the fundamental British values and their role in ensuring pupils understand these.		
12.	Ensure the Prevent risk assessment/action plan complete.		
13.	Ensure staff and management are inducted into the nursery's own Prevent strategy (e.g. curriculum programme, policies and procedures).		
14.	Ensure there is a designated safeguarding lead (and at least one deputy) in place. There should also be a Prevent lead and designated teacher for looked after children.		
15.	Ensure designated safeguarding lead refresher training is up to date.		
16.	Ensure deputy designated safeguarding lead(s) refresher training is up to date.		
17.	Ensure designated safeguarding lead JD/PS (Appendix 1 Safeguarding and Child Protection Policy) filed in DSL's and DDSL's personnel file.		
18.	Ensure close communication between DSL and attendance lead admin in order to monitor all pupils particularly our vulnerable pupils.		

No.	Key Actions	SLT	Action
19.	Ensure the local authority is informed when a pupil is deleted from the nursery register on any of the 15 grounds for deletion. Ensure that the local authority is aware of any missing information when a child is deleted from the nursery roll, such as the name of the destination nursery, or the address to which the child is moving. (This is to help identify children missing from education).		
20.	Ensure the designated LAC teacher has a separate job description.		
21.	Ensure SLT are familiar with the local safeguarding partners annual report. Consider the weaknesses/trends in the context of the Star nursery setting and make any necessary adjustments.		
22.	Ensure all staff know who the DSL/DDSL/Prevent officer are and how to contact/report concerns via the safeguarding system.		
23.	Ensure all pupils know who the DSL/DDSL/Prevent officer are – display posters of the DSL/DDSL in key areas throughout the nursery.		
24.	Ensure pupils have a number of avenues through which to express their opinions and raise concerns.		
25.	Ensure the nursery works in line with locally agreed procedures when dealing with safeguarding issues.		
26.	Ensure chair of the local governing body and designated governor for safeguarding is aware of governing body responsibilities with respect to safeguarding and the Prevent duty.		
27.	Ensure there is evidence of regular meetings between the designated governor for safeguarding and designated safeguarding lead.		
28.	Ensure the Manager's report to governors includes an update on safeguarding.		
29.	Ensure the Safeguarding Partners 157/175 Audit is completed annually.		
30.	Ensure safeguarding is a standing item on SLT agenda.		
31.	Ensure ECM Group records are clear, presentable and complete.		
32.	Ensure all pupils on a safeguarding or child protection plan have accurate and up to date records (including copy of the CP/CIN plan, clear chronology and meeting minutes)		
33.	Ensure procedures in place to deal with allegations of abuse against staff (including malicious allegations).		
34.	Ensure the management's HR team is informed as soon as the nursery are aware of any allegation against a staff member.		
35.	Ensure Safer Working Practices outline in Safeguarding Policy adhered to.		
36.	Ensure the nursery have more than one contact name and telephone number for each child.		
Safer Recruitment and Selection			

No.	Key Actions	SLT	Action
37.	Ensure the Recruitment and Selection Policy is in place and safer recruitment principles are adhered to.		
38.	Ensure full recruitment records are available for all staff and volunteers in line with the Star recruitment checklist.		
39.	Ensure selection processes take child protection into account with evidence of child protection question asked at interview.		
40.	Ensure regular checks are completed termly by the Manager and the nominated safeguarding governor.		
41.	Ensure one member of staff on any interview panel has completed safer recruitment training.		
42.	Ensure Manager plus two members of SLT have completed refresher safer recruitment training every 3 years.		
Safe Environment			
43.	Ensure there are dedicated displays linked to key messages around fundamental British values, safeguarding and personal safety.		
44.	Ensure there are display posters signposting pupils in need to support (e.g. Child Line, NSPCC).		
45.	Ensure appropriate measures/controls for the storage of medication in place.		
46.	Ensure that there is a risk assessment for all movement across the estate and that all staff are following it.		
47.	Ensure that there is a complete, clear and presentable risk assessment of the FULL estate for the last three terms, and that their action points have been implemented.		
48.	Ensure there is a complete and up-to-date fire risk assessment for entire estate.		
49.	Ensure an appropriate supervision rota is in place.		
50.	Ensure all electronic access panels for all areas of the nursery are working and gates are closing (if applicable).		
51.	Check that all staff have and wear identity badges.		
52.	Ensure all visitors are required to sign in and out of the nursery and given visitor badges and that staff and pupils are aware that they should challenge any individuals who are not known and not wearing visitor badge.		
53.	Ensure visitors have access to the nursery 'Safeguarding Guide for Visitors'		
54.	Check that all HSE and other risk awareness posters are clearly presented		
55.	Ensure appropriate web-filtering and monitoring in place (which is age-appropriate and includes monitoring of community languages).		
56.	Ensure all statutory checks are complete and evidenced.		

No.	Key Actions	SLT	Action
57.	Ensure appropriate first aid training is undertaken by relevant staff.		
58.	Ensure first aid boxes in place and appropriately signposted in Palm Tree Nursery.		
59.	Ensure that a suitably detailed log of accidents is maintained and is up to date.		
60.	Ensure appropriate fire safety/marshal training is undertaken by relevant staff.		
61.	Ensure emergency evacuations take place on a termly basis and evidenced.		
62.	Ensure procedures for lockdown are in place and records of drills retained.		
63.	Ensure Health and Safety Policy in place.		
64.	Ensure written confirmation from alternative providers confirming the relevant checks have taken place.		
Other related policies and procedures			
65.	Ensure the strategic plan includes Prevent priorities.		
66.	Ensure Management Anti-Bullying Policy in place and shared with staff.		
67.	Ensure Anti-Bullying approach outlined in Parent Handbook.		
68.	Ensure Anti-Bullying Policy available on Palm Tree Nursery website.		
69.	Maintain a central log of bullying, racist and peer on peer abuse incidents that is up-to-date and verified – Ofsted will want to speak to a pupil recorded in it.		
70.	Ensure the mental health checklist is reviewed termly and there is an adequate number of mental health first aiders in Palm Tree Nursery (in line with Management recommended numbers).		
71.	Ensure Volunteers Procedure implemented.		
72.	Ensure all external speakers are vetted, approved and recorded (including declarations) in line with Palm Tree Nursery External Speakers and Charities Policy and Management Vetting and Due Diligence Policy.		
73.	Ensure all charitable activity is approved and recorded in line with Palm Tree Nursery External Speakers and Charities Policy and Vetting and Due Diligence Policy.		
74.	Ensure staff familiar with the Staff Code of Conduct Policy.		
75.	Ensure pupils familiar with Code of Conduct appropriate for their age		
76.	Ensure Management Complaints Policy uploaded to website and complaints dealt with according to process outlined within.		
77.	Ensure staff and Management are familiar with Social Media Policy.		
78.	Ensure Home Palm Tree Nursery Agreements completed for all pupils.		
79.	Ensure website outlines inclusive offer.		

No.	Key Actions	SLT	Action
80.	Ensure Attendance and Punctuality Policy in place and procedures in place to respond to appropriately to children who go missing in education.		
81.	Ensure Palm Tree Nursery trips are run in line with the nursery Off Site Visits / Requirements		
82.	Ensure Palm Tree Nursery Whistleblowing Policy in place and uploaded to the Palm Tree Nursery website.		
83.	Ensure the nursery Supporting Pupils with Medical Conditions Policy in place and records relating to the medical needs register, administration of medication, support plans etc. up to date.		
84.	Ensure the Behaviour Policy is in place and adhered to.		
85.	Ensure the Equal Opportunities Policy in place and adhered to.		
86.	Ensure the Equalities Policy in place and adhered to.		
87.	Ensure the Pupil ICT Acceptable Use Policy in place and adhered to.		
88.	Ensure Management Electronic Information and Communications Policy in place and adhered to.		
89.	Ensure Management Induction Policy in place and adhered to.		
90.	Ensure Palm Tree Nursery PSHE Policy in place and adhered to.		
91.	Ensure the SEN – Information, Policy and Guidance Policy in place and adhered to.		
92.	Ensure an annual online safety review is completed to ensure the curriculum and supportive interventions reflect the risks the pupils face.		

No.	Key Actions	SLT	Action
93	Ensure curriculum evidence teaching of e-safety.		
94	Ensure curriculum promotes fundamental British Values.		
95	Ensure pupils are taught how to stay safe outdoors, identify and respond appropriately to risk (Twinkle resources on Safeguarding).		
Early Years			
96	Ensure that EYFS leader and staff working in the early years have read and understood <a href="#">‘The statutory framework for the early years: setting the standards for learning, development and care of children from birth to five.’</a> This document sets out the minimum standards for care of children in the early years.		
97	<p>Ensure that the specific staffing ratios for children aged 2,3 or 4 are adhered to and that Reception classes do not exceed infant class size regulations:</p> <p>For children aged 2:</p> <ul style="list-style-type: none"> <li>- there must be at least one member of staff for every 4 children</li> <li>- at least one member of staff must hold a full, relevant level 3 qualification</li> <li>- at least half of all other staff must hold a full, relevant level 2 qualification</li> </ul> <p>For children aged 3+:</p> <ul style="list-style-type: none"> <li>- where a person with QTS, EY Professional Status, EYTS or another suitable level 6 qualification is working directly with children:</li> <li>- there must be at least one member of staff for every 13 children</li> <li>- at least one other member of staff must hold a full and relevant level 3 qualification</li> </ul> <p>Where there is no person with QTS, EY Professional Status, EYTS or another suitable level 6 qualification working directly with children:</p> <ul style="list-style-type: none"> <li>- there must be at least one member of staff for every 8 children</li> <li>- at least one member of staff must hold a full and relevant level 3 qualification</li> <li>- at least half of all other staff must hold a full and relevant level 2 qualification</li> <li>- (Staff must be aged 17 or over to be counted within ratios. The Palm Tree Nursery must be satisfied that an apprentice or pupil on long-term placement aged 17 + is competent before including them in a ratio)</li> </ul> <p>For Reception class, the minimum legal requirement is one fully qualified teacher for every 30 children.</p>		
98	Ensure that a suitable induction process is in place that includes safeguarding of young children. This must include procedures for reporting concerns, administering medicine and the acceptable use of mobile phones/ technology.		
99	Ensure that at least one person who has received up to date certified training in paediatric first aid (PFA) is available at all times when early years children are present.		
100	<p>Ensure that:</p> <ul style="list-style-type: none"> <li>- written permission is received before any medication is administered</li> </ul>		

No.	Key Actions	SLT	Action
101	<ul style="list-style-type: none"> <li>- where medicine is provided on prescription, this can only be administered if prescribed for the named child by a doctor, dentist, nurse or pharmacist</li> <li>- records must be kept of any medicine that is administered</li> <li>- staff must receive appropriate training before administering medicines</li> <li>- any staff medication is secured safely.</li> </ul>		
102	Ensure that the dietary needs of children are known and acted upon. Ensure that hygienic facilities are in place for the preparation of healthy snacks and that fresh drinking water is always accessible.		
103	Ensure that toilets and, where necessary, nappy changing facilities, are adequate and hygienic.		
104	Ensure that a key person is identified for each child in the early years and that they are clear about their responsibilities with respect to this child.		
105	Ensure that a supervision process is in place for all staff working with early years children that enables the confidential discussion of sensitive issues.		
106	Ensure that arrangements can be made for staff to speak confidentially with parents and carers.		
107	Ensure that clear processes are in place to ensure children are only released to individuals notified to the Palm Tree Nursery, and that no children ever leave the premises unsupervised.		

#### Annual Review Records

Term	Review Date	Completed by
Autumn		
Spring		
Summer		

Appen