

CHILD PROTECTION POLICY – October 2025

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INTRODUCTION

Eaton Mill Nursery is committed to safeguarding and promoting the welfare, both physical and emotional, of every child both inside and outside of the setting premises. Eaton Mill Nursery implements a whole-setting preventative approach to managing safeguarding concerns, ensuring that the wellbeing of children is at the forefront of all action taken.

This Policy sets out a clear and consistent framework for delivering this promise, in line with safeguarding legislation and statutory guidance.

It will be achieved by:

- Creating a culture of safer recruitment by adopting procedures that help deter, reject or identify people who might pose a risk to children.
- Educating children on how to keep safe and to recognise behaviour that is unacceptable.
- Identifying and making provision for any child that has been subject to abuse.
- Ensuring that directors, the Chief Executive Officer (CEO) and staff members understand their responsibilities under safeguarding legislation and statutory guidance, and are alert to the signs of child abuse and know to refer concerns to the Designated Safeguarding Lead (DSL).
- Ensuring that the CEO and any new staff members and volunteers are only appointed when all the appropriate checks have been satisfactorily completed.
- Understanding the importance of considering the wider environmental factors in a child's life that may be a threat to their safety.

Key Contacts

Designated Safeguarding Lead (DSL)	Amie Stevens
Deputy Designated Safeguarding Lead (DDSL)	Jessica Weeks
Consultant Designated Safeguarding Lead (CDSL)	Olivia Cain
Senior Consultant for Safeguarding (SCS)	Collette Butler
Chief Executive Officer (CEO)	Warren Harrison
Director for Safeguarding	June Mason

In the event of not being able to contact the DSL or Deputy DSL, child protection matters will be dealt with by the CDSL or SCSL.

Children's Social Care Services (CSCS) 01908 253169/253170 / children@milton-keynes.gov.uk
Multi-Agency Hub (MASH)

1. Definition

In-line with the statutory definition of safeguarding (Source: Working Together to Safeguarding Children 2023), Eaton Mill Nursery will define **“safeguarding and promoting the welfare of children”** as:

- Providing help and support to meet the needs of children as soon as problems emerge.
- Protecting children from maltreatment, whether that is within or outside the home, including online.
- Preventing 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.
- Promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children.
- Taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework.

2. Legal Framework

This Policy has consideration for, and is compliant with, the following legislation and statutory guidance:

Legislation

- Children Act 1989
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- Sexual Offences Act 2003
- Female Genital Mutilation Act 2003 (as inserted by the Serious Crime Act 2015)
- Apprenticeships, Children and Learning Act 2009
- Equality Act 2010
- Counter-Terrorism and Security Act 2015
- The UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018
- Voyeurism (Offences) Act 2019
- Anti-social Behaviour, Crime and Policing Act 2014
- Marriage and Civil Partnership (Minimum Age) Act 2022
- Domestic Abuse Act 2021
- Education Act 2002
- The Education (Health Standards) (England) Regulations 2003
- Protection of Freedoms Act 2012
- Children and Families Act 2014

Statutory Guidance

- DfE (2018) 'Working together to safeguard children'
- DfE (2015) 'The Prevent duty'
- DfE (2025) 'Keeping children safe in education'
- DfE (2018) 'Disqualification under the Childcare Act 2006'
- HM Government (2020) 'Multi-agency statutory guidance on female genital mutilation'
- HM Government (2021) 'Channel Duty Guidance: Protecting people vulnerable to being drawn into terrorism'
- Home Office and Foreign, Commonwealth and Development Office (2023) 'Multi-agency statutory guidance for dealing with forced marriage and Multi-agency practice guidelines: Handling cases of forced marriage'
- DfE (2021) 'Statutory framework for the early years foundation stage'
- DfE (2015) 'What to do if you're worried a child is being abused'
- DfE (2018) 'Information sharing'

Other relevant setting policies and procedures include:

- Keeping Children Safe in Education (Part 1)
- Behaviour Policy
- Whistleblowing Policy
- Exclusion Policy
- Staff Code of Conduct
- Personal and Intimate Care Policy
- Accident, Incident and Emergency Policy
- Administering Medication Policy
- Food, Snack and Lunch Procedure
- Food and Drink Policy
- Hygiene Policy

3. Roles and Responsibilities

The Director has a duty to:

- Ensure that the setting complies with its duties under the above child protection and safeguarding legislation.
- Guarantee that the policies, procedures and training opportunities in the setting are effective and comply with the law at all times.
- Guarantee that the setting contributes to inter-agency working in line with the statutory guidance Working Together to Safeguard Children.
- Confirm that the setting's safeguarding arrangements consider the procedures and practice of the LA as part of the inter-agency safeguarding procedures established by the Local Safeguarding Partnership (LSP).
- Comply with its obligations under section 14B of the Children Act 2004 to supply the LSP with information to fulfil its functions.
- Ensure that a director is nominated to liaise with the LA Designated officer (LADO) and/or Ofsted and/or partner agencies on issues of child protection, and in the event of allegations of abuse made against the CEO or other director.
- Guarantee that there are effective child protection policies and procedures in place together with a staff code of conduct.
- Ensure that there is a senior board level lead responsible for safeguarding arrangements.
- Appoint a member of staff to the role of DSL and DDSL as an explicit part of the role-holder's job description – there should always be cover for the DSL.
- Adhere to statutory responsibilities to check staff who work with children, taking proportionate decisions on whether to ask for any checks beyond what is required.
- Guarantee that volunteers are appropriately supervised.
- Make sure that at least one person on any appointment panel has undertaken safer recruitment training.
- Ensure that all staff members receive safeguarding and child protection training updates, such as e-bulletins, emails and staff meetings, as required, but at least annually.
- Certify that there are procedures in place to handle allegations against members of staff or volunteers.
- Confirm that there are procedures in place to make a referral to the DBS if a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have been had they not resigned.
- Guarantee that there are procedures in place to handle allegations against other children.
- Ensure that appropriate disciplinary procedures are in place, as well as policies pertaining to the behaviour of children and staff.
- Make sure that children's wishes and feelings are taken into account when determining what action to take, and what services to provide to protect individual children.
- Guarantee that there are systems in place for children to express their views and give feedback.
- Establish an early help procedure and inform all staff of the procedures it involves.
- Appoint a designated teacher to promote the educational achievement of LAC and ensure that this person has undergone appropriate training.
- Introduce mechanisms to assist staff in understanding and discharging their roles and responsibilities.
- Make sure that staff members have the skills, knowledge and understanding necessary to keep LAC safe, particularly with regards to the child's legal status, contact details and care arrangements.
- Put in place appropriate safeguarding responses for children who go missing from setting, particularly on repeat occasions, to help identify any risk of abuse and neglect, including sexual abuse or exploitation, and prevent the risks of their disappearance in future.
- Ensure that all directors have been subject to an enhanced DBS check.

The CEO has a duty to:

- Safeguard children's wellbeing.
- Ensure that the policies and procedures adopted by the directors, particularly concerning referrals of cases of suspected abuse and neglect, are followed by staff members.
- Provide staff with the Child Protection Policy, Staff Code of Conduct, information regarding the role of the DSL and part one of the Keeping Children Safe in Education (KCSIE) guidance at induction.

The DSL has a duty to:

- Take lead responsibility for safeguarding and child protection, including online safety and understand the filtering and monitoring systems and processes in place.
- Provide advice and support to staff on child welfare, safeguarding and child protection matters.
- Take part in strategy discussions and inter-agency meetings, and/or support other staff to do so.
- Contribute to the assessment of children, and/or support other staff to do so.
- Act as a point of contact with the safeguarding partners.
- Refer cases to:
 - CSCS where abuse and neglect are suspected, and support staff who make referrals to CSCS.
 - The LA Designated Officer (LADO)
 - Channel programme where radicalisation concerns arise, and support staff who make referrals to the Channel programme.
 - DBS where a person is dismissed or has left due to harm, or risk of harm, to a child.
 - Police where a crime may have been committed, in line with the National Police Chiefs' Council (NPCC) guidance.
- Liaise with the CEO to inform him/her of safeguarding issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- Liaise with the Deputy DSL to ensure effective safeguarding outcomes.
- Liaise with the case manager and the LADO for child protection concerns in cases concerning staff.
- Understand the assessment process for providing early help and intervention.
- Keep cases of early help under constant review and refer them to the CSC if the situation does not appear to be improving.
- Have a working knowledge of how LAs 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.
- Ensure each member of staff has access to and understands the setting's Child Protection Policy and procedures – this will be discussed during the staff induction process.
- Be alert to the specific requirements of children in need, including those with social workers and SEND.
- Keep detailed, accurate and secure records of concerns and referrals.
- Obtain access to resources and attend any relevant training courses.
- Encourage a culture of listening to children and taking account of their wishes and feelings.
- Work with the directors and Consultant Designated Safeguarding Lead to ensure the setting's Child Protection Policy is reviewed annually and the procedures are updated regularly.
- Ensure the setting's Child Protection Policy is available publicly, and parents/carers are aware that the setting may make referrals for suspected cases of abuse or neglect, as well as the role the setting plays in these referrals.
- Ensure that a child's child protection file is copied when transferring to a new setting.
- Be available at all times during working hours to discuss any safeguarding concerns. EMN will determine what "available" means, e.g. it may be appropriate to be accessible by other means such as phone or Zoom.
- Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues with new settings including primary schools.
- Undergo training, and update this training at least every two years.
- Obtain access to resources and attend any relevant or refresher training courses.
- Understand the importance of information sharing, including within the setting, with other settings including schools, and with the safeguarding partners, other agencies, organisations and practitioners.
- Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK GDPR.
- Keep detailed, accurate, secure written records of safeguarding concerns, decisions made, and whether or not referrals have been made, and understand the purpose of this record-keeping.
- Keep cases of early help under constant review and refer them to the CSCS if the situation does not appear to be improving.

All staff members have a responsibility to:

- Undertake safeguarding training, including online safety training (which, amongst other things, includes an understanding of the expectations and responsibilities relating to filtering and monitoring), during their induction – this will be regularly updated.
- Receive and understand child protection and safeguarding (including online safety) updates, e.g. via email, as required, and at least annually.
- Consider, at all times, what is in the best interests of the child.
- Be aware of the role and identity of the DSL and deputies.
- Act in accordance with EMN procedures with the aim of eliminating unlawful discrimination, harassment and victimisation, including that in relation to child-on-child abuse.
- Be aware of and understand the procedure to follow in the event that a child confides they are being abused, exploited or neglected.
- Follow the setting's procedure for, and approach to, preventing radicalisation.
- Speak to the DSL if they are unsure about how to handle safeguarding matters.
- Safeguard children's wellbeing and maintain public trust in their profession as part of their professional duties.
- Provide a safe environment in which children can develop and learn.
- Maintain an attitude of 'it could happen here' where safeguarding is concerned.
- Be aware of the signs of abuse and neglect.
- Be aware of the early help process, be prepared to identify children who may benefit from early help and understand their role in it.
- Be aware of, and understand, the process for making referrals to CSC, as well as for making statutory assessments under the Children Act 1989 and their role in these assessments.
- If at any point there is a risk of immediate serious harm to a child, make a referral to CSC and/or the police immediately.
- Maintain appropriate levels of confidentiality when dealing with individual cases, and always act in the best interest of the child.
- Inform the setting where they are in a position where their relationships and associations outside of setting (including online) may have an implication for the safeguarding of children in setting.
- Be aware that a child may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or may not recognise their experiences as harmful.
- Reassure victims that they are being taken seriously, that they will be supported, and that they will be kept safe.
- Be aware of safeguarding issues that can put children at risk of harm.
- Be aware of behaviours that could potentially be a sign that a child may be at risk of harm.

4. Inter-agency Working

Eaton Mill Nursery contributes to inter-agency working as part of its statutory duty.

The setting will work with CSCS, the police, health services and other services to protect the welfare of its children, through the early help process and by contributing to inter-agency plans to provide additional support.

The setting recognises the importance of information sharing between professionals and local agencies in order to effectively meet children's needs.

In light of the above, staff members are aware that whilst the Data Protection Act 1998 places a duty on settings to process personal information fairly and lawfully, it is not a barrier to sharing information where failure to do so would result in the child being placed at risk of harm.

5. Early Help

Early help means providing support as soon as a problem emerges, at any point in a child's life. Any child may benefit from early help, but in particular, staff will be alert to the potential need for early help for children who:

- Are disabled, have certain health conditions, or have specific additional needs.
- Have SEND, regardless of whether they have a statutory EHC plan.
- Have mental health needs.
- Are young carers.
- Show signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines.
- Are frequently missing or going missing from care or from home.
- Are at risk of modern slavery, trafficking, or sexual or criminal exploitation.
- Are at risk of being radicalised or exploited.
- Have family members in custody, prison, or are affected by parental offending.
- Are in a family circumstance presenting challenges for them, such as drug and alcohol misuse, adult mental health problems, or domestic abuse.
- Have returned home to their family from care.
- Are at risk of Honour Based Abuse (HBA), such as Female Genital Mutilation (FGM) or forced marriage.
- Are privately fostered.
- Are persistently absent from the setting/education.
- Show early signs of abuse and/or neglect in other ways.

The Nursery will not limit its support to children affected by the above and will be mindful of a variety of additional circumstances in which children may benefit from early help, for example, if they are:

- Bereaved.
- Viewing problematic or inappropriate online content.

Staff will be mindful of all signs of abuse, neglect and exploitation and use their professional curiosity to raise concerns to the DSL.

The DSL will take the lead where early help is appropriate. This includes liaising with other agencies and setting up an inter-agency assessment as appropriate. The local early help process will be followed as required.

Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner. Any such cases will be kept under constant review and consideration given to a referral to CSCS for assessment for statutory services if the child's situation is not improving or is worsening.

6. Abuse and Neglect and Exploitation

For the purposes of this Policy, **“abuse”** is defined as a form of maltreatment of a child which involves inflicting harm or failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing the ill treatment of others – this can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family, institutional or community setting by those known to them or by others, e.g. via the internet. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by one or multiple adults or other children.

For the purposes of this Policy, **“physical abuse”** is defined as a form of abuse which may involve actions such as hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical abuse can also be caused when a parent fabricates the symptoms of, or deliberately induces, illness in a child.

For the purposes of this Policy, **“emotional abuse”** is defined as the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. This may involve conveying to a child that they are worthless, unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child the opportunities to express their views, deliberately silencing them, 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children, such as interactions that are beyond their developmental capability, overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-

treatment of another. It may involve serious bullying, including cyberbullying, causing the child to frequently 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, but it may also occur alone.

For the purposes of this Policy, “**sexual abuse**” is defined as abuse that involves forcing or enticing a child to take part in sexual activities, not necessarily involving violence, and regardless of whether the child is aware of what is happening. This may involve physical contact, including assault by penetration, or non-penetrative acts, such as masturbation, kissing, rubbing, and touching outside of clothing. It may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can be perpetrated by people of any gender and age.

For the purposes of this Policy, “**neglect**” is defined as the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in serious impairment of a child's health or development. This may involve a parent or carer failing to provide a child with adequate food, clothing or shelter (including exclusion from home or abandonment); failing to protect a child from physical or emotional harm or danger; failing to ensure adequate supervision (including through the use of inappropriate caregivers); or failing to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

For the purpose of this Policy “**child exploitation**” is defined as a form of abuse where an individual or group takes advantage of a power imbalance to coerce, manipulate, or deceive a child for their own gain. This gain can be financial, sexual, or for increased status.

Indicators

All staff will be aware of the indicators of abuse, neglect and exploitation and will understand that children can be at risk of harm inside and outside of the setting, inside and outside of home, in an institutional or community setting by those known to them or by others, and online. Staff will also be aware that children can be affected by seeing, hearing or experiencing the effects of abuse.

All staff members will be aware of the indicators of abuse and the appropriate action to take following a child being identified as at potential risk of abuse or neglect.

All staff will be aware that technology is a significant component in many safeguarding and wellbeing issues, including online abuse, cyberbullying, and the sharing of indecent images.

When identifying children at risk of potential harm, staff members will look out for a number of indicators including, but not limited to, the following:

- Injuries in unusual places that are also inconsistent with their age.
- Poor concentration and acting withdrawn.
- Knowledge ahead of their age, e.g. sexual knowledge.
- Use of explicit language.
- Fear of abandonment.
- Depression and low self-esteem.

All staff will be aware of the behaviours linked to drug taking, alcohol abuse, truancy and image based sexual abuse, and will understand that these put children in danger.

All staff should be able to reassure victims 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 abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

Staff members will be aware of the effects of a child witnessing an incident of abuse at home, such as witnessing act/s of violence or threatening behaviour, emotional, psychological, controlling or coercive behaviour, sexual and/or economic abuse. Children witnessing this are classified as victims of domestic violence in their own right.

7. Specific Safeguarding Issues

There are certain specific safeguarding issues that can put children at risk of harm – staff will be aware of these issues.

Appendix C of this Policy sets out details about specific safeguarding issues that children may experience and outlines specific actions that would be taken in relation to individual issues.

8. Child-on-Child Abuse

For the purposes of this Policy, “**child-on-child abuse**” is defined as abuse between children. The setting has a zero-tolerance approach to abuse, including child-on-child abuse.

All staff will be aware that child-on-child abuse can occur between children of any age and gender, both inside and outside of the setting, as well as online. We also recognise that girls are more likely to be victims and boys more likely to be perpetrators but that all child-on-child abuse is unacceptable and will be taken seriously.

All staff will be aware of the indicators of child-on-child abuse, how to identify it, and how to respond to reports. All staff will also recognise that even if no cases have been reported, this is not an indicator that child-on-child abuse is not occurring. All staff will speak to the DSL if they have any concerns about child-on-child abuse.

All staff will understand the importance of challenging inappropriate behaviour between peers, and will not tolerate abuse as “banter” or “part of growing up”.

Child-on-child abuse can be manifested in many different ways, which aims to cause physical, emotional or psychological harm including:

- Bullying, including cyberbullying and prejudice-based or discriminatory bullying.
- Emotional abuse
- Physical abuse – this may include an online element which facilitates, threatens and/or encourages physical abuse.
- Sexual violence – this may include an online element which facilitates, threatens and/or encourages sexual violence.
- Sexual harassment, including online sexual harassment, which may be standalone or part of a broader pattern of abuse.
- Causing someone to engage in sexual activity without consent.

All staff will be clear as to the setting’s policy and procedures regarding child-on-child abuse and the role they have to play in preventing it and responding where they believe a child may be at risk from it.

Children will be made aware of how to raise concerns or make a report and how any reports will be handled. This includes the process for reporting concerns about friends or peers. Children will also be reassured that they will be taken seriously, be supported, and kept safe.

9. Online Safety

Through training, all staff members will be made aware of:

- Attitudes and behaviours which may indicate children are at risk of potential harm online.
- The procedure to follow when they have a concern regarding a child’s online activity.

EMN will ensure that appropriate filtering systems are in place on ICT equipment/devices to prevent children accessing inappropriate material. EMN will however ensure that the use of filtering and monitoring systems does not cause “over blocking”, which may lead to unreasonable restrictions as to what children can be taught online.

Staff will be aware of the filtering systems in place and will know how to escalate concerns where they are identified. Staff will be made aware of their expectations and responsibilities relating to filtering and monitoring systems during their induction.

Personal electronic devices

Mobile phones are not permitted on the Nursery floor. Any staff member seen using their electronic device inappropriately or for personal reasons during contact time with children may be subject to disciplinary action.

Staff are permitted to wear smart watches but must ensure these are on Aeroplane Mode whenever present in the nursery building. Staff may use these for basic functionality such as using the clock or timer function. Any staff member seen using their smart watch inappropriately or for personal reasons whilst on the Nursery floor may be subject to disciplinary action. No smart watches that have the capacity to take or record image are permitted.

Photographs and videos of children will be carefully planned before any activity with particular regard to consent and adhering to data protection. Images are only taken on EMN devices, no personal devices are allowed to be used for this purpose.

Where photographs and videos will involve children who are LAC, adopted children, or those for whom there are security concerns, the DSL will determine the steps involved. The DSL will, in known cases of children who are LAC or who have been adopted, liaise with the child's social workers, carers or adoptive parents to assess the needs and risks associated.

Staff will report any concerns about children's or other staff members' use of personal electronic devices to the DSL, following the appropriate procedures.

10. Context of Safeguarding Incidents

Safeguarding incidents can occur outside of the setting and can be associated with outside factors. All staff, particularly the DSL and deputy DSLs, will always consider the context of safeguarding incidents.

Assessment of children's behaviour will consider whether there are wider environmental factors that are a threat to their safety and/or welfare. EMN will provide as much contextual information as possible when making referrals to CSCS.

11. Children Potentially at Greater Risk of Harm

The setting recognises that some groups of children can face additional safeguarding challenges, and understands that further barriers may exist when determining abuse and neglect in these groups of children. Additional considerations for managing safeguarding concerns and incidents amongst these groups are outlined below.

Children with Social Workers

Children may need social workers due to safeguarding or welfare needs. These needs can leave children vulnerable to further harm and educational disadvantage.

As a matter of routine, the DSL will hold and use information from the LA about whether a child has a social worker in order to make decisions in the best interests of the child's safety, welfare, and educational outcomes.

Where a child needs a social worker, this will inform decisions about safeguarding, e.g. responding to unauthorised absence, and promoting welfare, e.g. considering the provision pastoral or academic support.

LAC and PLAC

Children most commonly become looked after because of abuse and/or neglect. Because of this, they can be at potentially greater risk in relation to safeguarding. PLAC, also known as care leavers, can also remain vulnerable after leaving care.

The setting will ensure that staff have the skills, knowledge and understanding to keep LAC and PLAC safe. This includes ensuring that the appropriate staff have the information they need, such as:

- Looked after legal status, i.e. whether they are looked after under voluntary arrangements with consent of parents, or on an interim or full care order.
- Contact arrangements with parents or those with parental responsibility.
- Care arrangements and the levels of authority delegated to the carer by the authority looking after the child.

Children with SEND

When managing safeguarding in relation to children with SEND, staff will be aware of the following:

- Certain indicators of abuse, such as behaviour, mood and injury, may relate to the child's disability without further exploration; however, it should never be assumed that a child's indicators relate only to their disability.
- Children with SEND can be disproportionately impacted by issues such as bullying, without outwardly showing any signs.
- Communication barriers may exist, as well as difficulties in overcoming these barriers.
- Risk of peer isolation.

The setting will create individual Support Plans including Risk Management for children with SEND who display unsafe behaviours to minimise the likelihood of challenging behaviour.

When reporting concerns or making referrals for children with SEND, the above factors will always be taken into consideration. When managing a safeguarding issue relating to a child with SEND, the DSL will liaise with the setting's Consultant for SEND when required, as well as the child's parents/carers where appropriate, to ensure that the child's needs are met effectively.

Children requiring mental health support

All staff will be made aware that mental health problems can, in some cases, be an indicator that a child has suffered, or is at risk of suffering, abuse, neglect or exploitation.

12. Private Fostering

A private fostering arrangement is essentially one that is made privately (that is to say without the involvement of a local authority) for the care of a child under the age of 16 (under 18, if disabled) by someone other than a parent or close relative with the intention that it should last for 28 days or more. The period for which the child is cared for and accommodated by the private foster carer should be continuous, but that continuity is not broken by the occasional short break.

Private fostering arrangements can be a positive response from within the community to difficulties experienced by families. Nonetheless, privately fostered children remain a diverse and potentially vulnerable group.

The private foster carer becomes responsible for providing the day to day care of the child in a way which will promote and safeguard the child's welfare. Overarching responsibility for safeguarding and promoting the welfare of the privately fostered child remains with the parent or other person with parental responsibility.

In light of the above, the setting understands that it has a mandatory duty to inform the local authority of children in such arrangements.

13. Concerns About a Child

When identifying concerns, staff members will use their professional judgement and decisions will be made on a case-by-case basis.

All staff members are aware of the procedure for reporting concerns and understand their responsibilities in relation to confidentiality and information sharing, as outlined in this Policy.

If a staff member has any concerns about a child, they will raise them with the DSL as soon as possible or, if necessary, refer the case to specialist or early help services. Staff understand that a child may not tell them about their abuse and that it may be that this is overheard, or the child's behaviour changes which raises the concern.

Staff will be aware that children may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or they may not recognise their experiences as harmful. Staff will be aware that this must not prevent them from having professional curiosity and speaking to the DSL, DDSL, or CDSL if they have a concern about a child.

Where the DSL is not available to discuss the concern with, staff members will contact the deputy DSL.

All staff members are aware that all verbal conversations causing concern must be promptly recorded in writing and passed to the DSL.

If a referral is made about a child by anyone other than the DSL, the deputy DSL and DSL will be informed as soon as possible.

The CSCS will make a decision regarding what action is required and will notify the referrer.

The DSL is required to monitor a referral if they do not receive information from the CSCS regarding what action is necessary for the child.

If the situation does not improve after a referral, the DSL will ask for reconsideration to ensure that their concerns have been addressed and that the situation improves for the child.

If early help is appropriate, the case will be kept under constant review. If the child's situation does not improve, a referral will be considered.

All concerns, discussions and decisions made, as well as the reasons for making those decisions, will be recorded by the DSL on the Inclusion Contact Sheet, stored electronically and any physical safeguarding files will be kept securely in a locked cabinet in the DSL's office.

If a child is in immediate danger, a referral will be made to CSCS and/or the police straight away.

Where there are safeguarding concerns, the setting will ensure that the child's wishes are taken into account, and that there are systems available for children to provide feedback and express their views.

When responding to safeguarding concerns, staff members will act calmly and supportively, ensuring that the child feels like they are being listened to and believed.

An inter-agency assessment will be undertaken where a child and their family could benefit from coordinated support from more than one agency. These assessments will identify what help the child and family require in preventing needs escalating to a point where intervention would be needed.

14. Managing Referrals

The reporting and referral process outlined in Appendix A (KCSIE) will be followed accordingly.

All staff members, in particular the DSL and Deputy DSL, will be aware of the LA's arrangements in place for managing referrals. The DSL will provide staff members with clarity and support where needed.

When making a referral to CSCS or other external agencies, information will be shared in line with this Policy and will only be shared where necessary to do so.

The DSL will work alongside external agencies, maintaining continuous liaison, including multi-agency liaison where appropriate, in order to ensure the wellbeing of the children involved.

The DSL will work closely with the police to ensure the setting does not jeopardise any criminal proceedings, and to obtain help and support as necessary.

The setting will not wait for the start, or outcome, of an investigation before protecting the victim and other children; this applies to criminal investigations as well as those made by CSCS.

Where CSCS decides that a statutory investigation is not appropriate, the setting will give consideration to referring the incident again if it is believed that the child is at risk of harm.

Where CSCS decides that a statutory investigation is not appropriate and the setting agrees with this decision, the setting will give consideration to the use of other support mechanisms, such as early help and pastoral support.

Discussions of concerns with parents/carers will only take place where this would not put the child or others at potential risk of harm.

The setting will work closely with parents/carers to ensure that the child, as well as their family, understands that the arrangements in place, such as in-setting interventions, are effectively supported and know where they can access additional support.

15. Concerns About Staff Members and Safeguarding Practices

If a staff member has concerns about another member of staff (including supply staff and volunteers) where they have behaved in a way or been involved in, either whilst at work or outside of the setting, that indicates they may not be suitable to work with children, then this **must** be raised with the CEO.

If the concern is with regards to the CEO, it will be referred to the director for safeguarding.

Any concerns regarding the safeguarding practices at Eaton Mill Nursery will be raised with the CEO, and the necessary whistleblowing procedures will be followed, as outlined in the Whistleblowing Policy.

If a staff member feels unable to raise an issue with the CEO, they should access other whistleblowing channels such as the NSPCC whistleblowing helpline (0800 028 0285).

Any allegations of abuse made against staff members will be dealt with in accordance with the setting's Allegations of Abuse Against Staff Statement.

Ofsted will be notified within 14 days of any allegations of serious harm or abuse by any person working in the setting.

16. Low Level Concerns

Eaton Mill Nursery will promote an open and transparent culture in which all concerns about adults (including supply staff, volunteers and contractors) are dealt with promptly and appropriately creating a culture in which all concerns about adults are shared responsibly and with the right person, recorded and dealt with appropriately.

A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of EMN may have acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and does not meet the allegations or harms threshold or is otherwise not considered serious enough to consider a referral to the LADO. Examples of such behaviour could include, but are not limited to:

- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door;

- using inappropriate sexualised, intimidating or offensive language.

Low-level concerns will be handled in line with the setting's Reporting Low-level Safeguarding Concerns Policy.

17. Communication and Confidentiality

All child protection and safeguarding concerns will be treated in the strictest of confidence in accordance with data protection policies. Staff members are aware that The Data Protection Act 2018 and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe. This includes allowing practitioners to share information without consent where failure to do so would result in the child being placed at risk of harm.

Where there is an allegation or incident of sexual abuse or violence, the victim is entitled to anonymity by law; therefore, the setting will consult its policy and agree what information will be disclosed to staff and others, in particular the alleged perpetrator and their parents/carers. Where a report of sexual violence or sexual harassment is progressing through the criminal justice system, the Nursery will do all it can to protect the anonymity of the child/ren involved in the case.

Concerns will only be reported to those necessary for its progression (e.g. the child's key worker, if it's not safe for the child to be with a certain relative following a safeguarding concern raised), and reports will only be shared amongst staff members and with external agencies on a need-to-know basis.

During disclosure of a concern by a child, staff members will not promise the child confidentiality and will ensure that they are aware of what information will be shared, with whom and why.

Where it is in the public interest, and protects children from harm, information can be lawfully shared without the victim's consent, e.g. If doing so would prejudice the prevention, detection or prosecution of a serious crime.

Depending on the nature of a concern, the DSL will discuss the concern with the parents/carers of the children involved.

- Where discussion with the parents/carers could potentially put a child at risk of harm, this will not be done.
- Discussion with the victim's parents/carers will relate to the arrangements being put in place to safeguard the victim, with the aim of understanding their wishes in terms of support arrangements and the progression of the report.
- External agencies will be invited to these discussions where necessary.

Where confidentiality or anonymity has been breached, the setting will implement the appropriate disciplinary procedures as necessary and will analyse how damage can be minimised and future breaches be prevented.

Where a child is leaving the setting, the DSL will consider whether it is appropriate to share any information with the child's new provider, in addition to the child protection file, that will allow the new provider to support the child and arrange appropriate support for their arrival.

18. Safer Recruitment

An enhanced DBS check with barred list information will be undertaken for all staff members engaged in regulated activity. A person will be considered to be in 'regulated activity' if, as a result of their work, they:

- Are responsible on a daily basis for the care or supervision of children.
- Regularly work in the setting at times when children are on the premises.
- Regularly come into contact with children under 18 years of age.

These will be retained by the setting for the duration of employment and for 6 months for unsuccessful candidates.

Pre-employment Checks

The directors will assess the suitability of prospective employees by:

- Verifying the candidate's identity, preferably from the most current photographic ID and proof of address except where, for exceptional reasons, none is available.
- Obtaining a certificate for an enhanced DBS check with barred list information where the person will be engaged in regulated activity.
- Obtaining a separate barred list check if an individual will start work in regulated activity before the DBS certificate is available.
- Checking that a candidate to be employed is not subject to a prohibition order issued by the Secretary of State.
- Verifying the candidate's mental and physical fitness to undertake their working responsibilities, including asking relevant questions about disability and health to establish whether they have the physical and mental capacity for the specific role.
- Checking the person's right to work in the UK. If there is uncertainty about whether an individual needs permission to work in the UK, the advice set out on the Gov.uk website will be followed.
- If the person has lived or worked outside the UK, making any further checks that the setting considers appropriate; this includes checking for any sanctions or restrictions that an EEA professional regulating authority has imposed.
- Checking professional experience and qualifications as appropriate.

A DBS certificate will be obtained from candidates before or as soon as practicable after appointment. An online update check may be undertaken through the DBS update service if an applicant has subscribed to it and gives their permission.

An enhanced criminal records DBS check will be carried out for each member of the directors.

The setting will refer to the DBS anyone who has harmed a child, poses a risk of harm to a child, or if there is reason to believe the member of staff has committed an offence and has been removed from working in regulated activity. A supervised volunteer who regularly works with or looks after children is not in regulated activity.

Barred List Check

An enhanced DBS check may be requested for anyone working in setting that is not in regulated activity, but does not have a barred list check.

If there are concerns about an applicant, an enhanced DBS check with barred list information may be requested, even if he/she has worked in regulated activity in the three months prior to appointment.

Written information about their previous employment history will be obtained from candidates and the appropriate checks undertaken to ensure information is not contradictory or incomplete.

References

References will be obtained directly from referees and scrutinised, with all concerns satisfactorily resolved prior to confirmation of employment.

References will be sought on all short-listed candidates, including internal ones, and checked on receipt to ensure that all specific questions were answered satisfactorily.

Information about past disciplinary actions or allegations will be considered carefully when assessing an applicant's suitability for a post.

Checks will be conducted to ensure that the person presenting themselves for work is the same person on whom the checks have been made.

Volunteers

No volunteer will be left unsupervised with a child or allowed to work in regulated activity until the necessary checks have been obtained.

An enhanced DBS certificate with barred list check will be obtained for all new volunteers in regulated activity that will regularly teach or look after children on an unsupervised basis or provide personal care on a one-off basis.

The setting will obtain an enhanced DBS certificate with barred list check for existing volunteers that provide pastoral care.

Unless there is cause for concern, the setting will not request any new DBS certificates with barred list check for existing volunteers that have already been checked.

A risk assessment will be undertaken for volunteers not engaged in regulated activity when deciding whether to seek an enhanced DBS check.

The setting will ensure that policies and procedures are in place to protect children from harm during work experience placements.

The setting will ensure that any contractor or employee of the contractor working on the premises has been subject to the appropriate level of DBS check.

Contractors without a DBS check will be supervised if they will have contact with children. The identity of the contractor will be checked upon their arrival at the setting.

DBS certificates will be securely destroyed as soon as practicable, but not retained for longer than six months from receipt, as outlined in the Data Protection Act 1998.

A copy of the other documents used to verify the successful candidate's identity, right to work and required qualifications will be kept for the personnel file.

19. Single Central Record (SCR)

The setting keeps an SCR which records all staff, including supply staff, who work at the setting.

The following information is recorded on the SCR:

- An identity check
- A barred list check
- An enhanced DBS check
- A prohibition from teaching check
- A check of professional qualifications
- A check to determine the individual's right to work in the UK
- Additional checks for those who have lived or worked outside of the UK
- A signed statement of receipt of Part 1 and Annex A from Keeping Children Safe In Education 2023.

For supply staff, the setting will also record whether written confirmation from the employment business supplying the member of staff has been received, which indicates that all of the necessary checks have been conducted and the date that confirmation was received.

If any checks have been conducted for volunteers, this will also be recorded on the SCR.

20. Staff Suitability

All settings providing care for children under the age of eight must ensure that staff and volunteers working in these settings are not disqualified from doing so under the Childcare (Disqualification) Regulations.

A person may be disqualified if they:

- Have certain orders or other restrictions placed upon them.
- Have committed certain offences.

A disqualified person will not be permitted to continue working in the setting, unless they apply for and are granted a waiver from Ofsted. The setting will provide support with this process.

Staff must inform the setting where they are in a position where their relationships and associations outside of setting (including online) may have an implication for the safeguarding of children in the setting.

All staff are expected to inform the setting if their circumstances change which may have implications for the safeguarding of children in the setting.

The setting is required to inform all existing and new staff that the Disqualification under the Childcare Act 2006 applies to them should they work with children above reception age during nursery hours and/or children under 8 in supervised activities during out of provision hours and as such are required to complete a self-declaration to ensure their suitability to work in the setting.

21. Training

Staff members will undergo safeguarding and child protection training at induction, which will be updated yearly and/or whenever there is a change in legislation or in response to need.

The induction training will cover:

- The Child Protection Policy.
- The Child-on-child Abuse Policy and procedures.
- The Staff Code of Conduct.
- Part one of 'Keeping children safe in education' (KCSIE) (or Annex A, if appropriate).
- The Behaviour Policy.
- Appropriate child protection and safeguarding training, including online safety training – which, amongst other things, includes an understanding of expectations, applicable roles and responsibilities in relation to filtering and monitoring.
- Information about the role and identity of the DSL and deputy DSLs.

All staff members will also receive regular safeguarding and child protection updates as required, but at least annually. Training will cover, at a minimum:

- The issues surrounding sexual violence and sexual harassment.
- Contextual safeguarding.
- How to keep LAC and PLAC safe.
- CCE and the need to refer cases to the National Referral Mechanism.
- Updated online safety training.

Staff will receive opportunities to contribute towards and inform the safeguarding arrangements in the setting.

The DSL and DDSL will undergo updated child protection training every two years, as well as additional training to refresh their skills and knowledge at regular intervals (at least annually) to allow them to keep up-to-date with any developments relevant to their role.

All staff will complete the Government's online Prevent awareness training which will enable them to understand their responsibilities with regards to the Prevent duty, and equip them with the knowledge needed to address concerns and/or refer concerns.

22. Qualifications and Ratios

Nursery Qualifications

The Nursery Manager must hold at least a full and relevant level 3 qualification and at least half of all other staff must hold at least a full and relevant level 2 qualification. The manager should have at least two years' experience of working in an early years setting, or have at least two years' other suitable experience. EMN will also ensure there is a named deputy who is capable and qualified to take charge in the manager's absence.

At least one person who has a current paediatric first aid (PFA) certificate must be on the premises and available when children are present and must accompany children on outings. PFA training must be renewed every three years and be relevant for workers caring for young children. All newly qualified early years practitioners who have completed a level 2 and/or level 3 qualification on or after 30 June 2016, must also have either a full PFA or an emergency PFA certificate within three months of starting work to be included in the required staff: child ratios at level 2 or level 3.

Nursery Ratios

Children must be within sight and/or hearing of staff. Children on long term placements and volunteers (aged 17 or over) and staff working as apprentices in early education (aged 16 or over) may be included in the ratios. The ratio and qualification requirements below apply to the total number of staff available to work directly with children. Exceptionally, and where the quality of care and safety and security of children is maintained, changes to the ratios may be made.

For children aged two there must be at least one member of staff for every five children; at least one member of staff must hold a full and relevant level 3 qualification and at least half of all other staff must hold a full and relevant level 2 qualification.

For children aged three and over where a person with Qualified Teacher Status, Early Years Professional Status, Early Years Teacher Status or another suitable level 6 qualification is working directly with the children there must be at least one member of staff for every 13 children and at least one other member of staff must hold a full and relevant level 3 qualification.

For children aged three and over when a person with Qualified Teacher Status, Early Years Professional Status, Early Years Teacher Status or another suitable level 6 qualification is not working directly with the children there must be at least one member of staff for every eight children and at least one member of staff must hold a full and relevant level 3 qualification and at least half of all other staff must hold a full and relevant level 2 qualification.

23. Monitoring and Review

This Policy is reviewed at least annually by the DSL and the CEO. This Policy will be updated as needed to ensure it is up-to-date with safeguarding issues as they emerge and evolve, including any lessons learnt. Any changes made to this Policy will be communicated to all members of staff. All members of staff are required to familiarise themselves with all processes and procedures outlined in this Policy as part of their induction programme. The next scheduled review date for this policy is September 2026.

Any child protection incidents at EMN will be followed by a review of the safeguarding procedures within the setting and a prompt report provided. Where an incident involves a member of staff, the LADO will assist in this review to determine whether any improvements can be made to the Nursery's procedures.

If any concerns are raised by the LADO or Ofsted about safeguarding issues, the following actions will be taken:

- The DSL carries out an investigation as a priority and comply with any deadlines given
- The appropriate person reports to the LADO or Ofsted on the findings of the investigation and sets out any action to be taken
- The Nursery endeavours to comply as soon as possible with any recommendations from the LADO or Ofsted

Appendix A - Contacts and Advice

Eaton Mill Nursery Key Contacts

Designated Safeguarding Lead (DSL)
Deputy Designated Safeguarding Lead (DDSL)
Consultant Designated Safeguarding Lead (CDSL)
Senior Consultant for Safeguarding (SCS)
Chief Executive Officer (CEO)
Director for Safeguarding

Amie Stevens
Jessica Weeks
Olivia Cain
Collette Butler
Warren Harrison
June Mason

In the event of not being able to contact the DSL or Deputy DSL, child protection matters will be dealt with by the CDSL or SCSL.

SCSC: Milton Keynes Local Authority (MKLSP)

If you are concerned about the safety or wellbeing of a child contact:

Multi Agency Safeguarding Hub (MASH)
Daytime during the week - Phone: 01908 253169 and 01908 253170
Email: children@milton-keynes.gov.uk
Out of hours evenings, weekends and bank holidays -Phone: 01908 265545 (Emergency Social Work Team)

If you are concerned about allegations against a member of staff contact:

Local Authority Designated Officer (LADO)
Phone: 01908 254307
Email: lado@milton-keynes.gov.uk
Staff: Kay Newman, Melanie Perkins, Denise Goodson

If you are concerned about safeguarding and welfare of children and vulnerable adults contact:

MK Together
Phone: 01908 254373
Email: mktogether@milton-keynes.gov.uk
[MK Together website](#)

If you are concerned and require additional information on prevention of child abuse or want to report a concern contact:

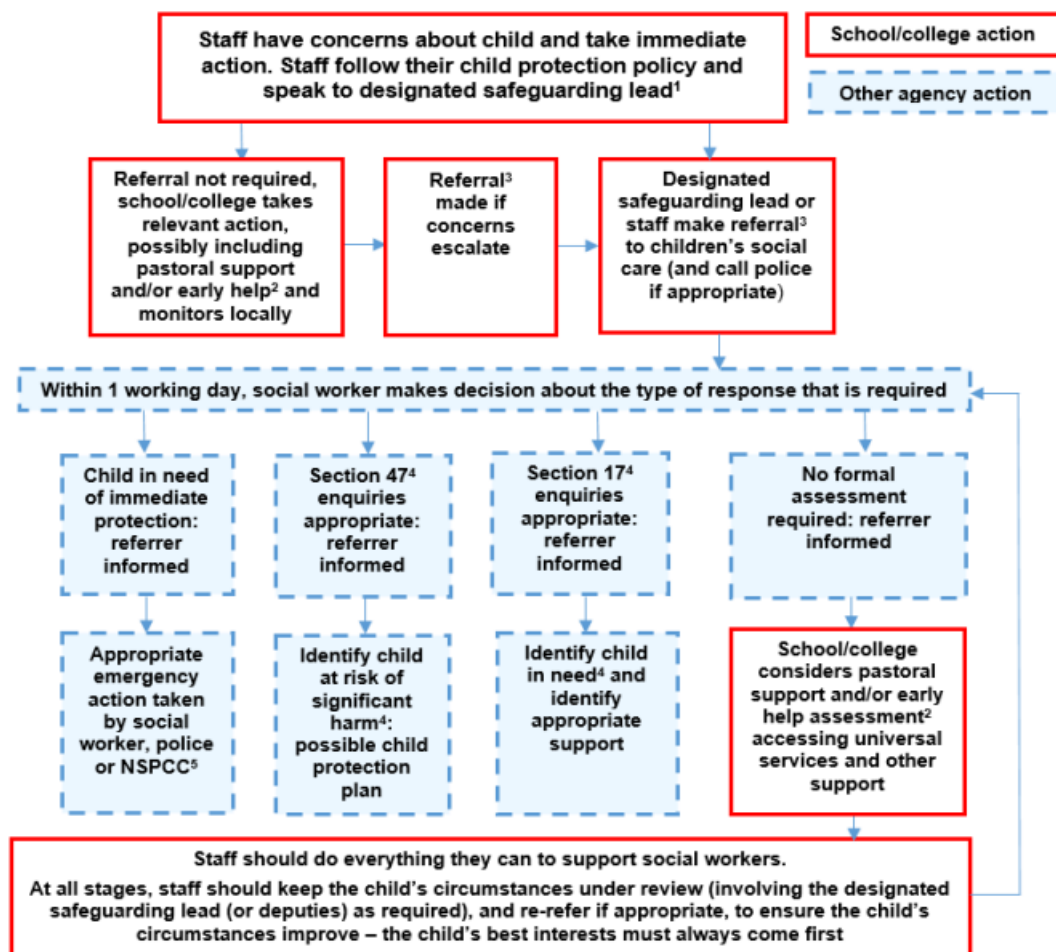
National Society Prevention of Cruelty to Children (NSPCC)
Phone: 0808 800 5000
[NSPCC website](#)

If you are concerned about terrorism or want to report a concern contact:

Prevent Duty Referrals
Prevent Help Line 0800 011 3764
[Report online](#)

A flowchart setting out the actions taken where there are concerns about a child

Figure 1



¹ In cases which also involve a concern or an allegation of abuse against a staff member, see Part four of this guidance.

² Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. [Working Together to Safeguard Children](#) provides detailed guidance on the early help process.

³ Referrals should follow the process set out in the local threshold document and local protocol for assessment. See [Working Together to Safeguard Children](#).

⁴ Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in [Working Together to Safeguard Children](#).

⁵ This could include applying for an Emergency Protection Order (EPO).

Appendix C – Specific Safeguarding Issues

This appendix sets out details about specific safeguarding issues that children may experience and outlines specific actions that would be taken in relation to individual issues.

Here are the issues covered:

- Domestic abuse
- Homelessness
- Children absent from education
- Child abduction and community safety incidents
- Child criminal exploitation (CCE)
- Cyber-crime
- Child sexual exploitation (CSE)
- Modern slavery
- FGM
- Virginity testing and hymenoplasty
- Forced marriage
- Radicalisation
- Children with family members in prison
- Children required to give evidence in court
- Mental health
- Serious violence

Domestic Abuse

For the purposes of this Policy, and in line with the Domestic Abuse Act 2021, “domestic abuse” is defined as abusive behaviour of a person towards another person (including conduct directed at someone else, e.g. the person’s child) where both are aged 16 or over and are personally connected. “Abusive behaviour” includes physical or sexual abuse, violent or threatening behaviour, controlling or coercive behaviour, economic abuse, psychological or emotional abuse, or another form of abuse.

“Personally connected” includes people who:

- Are, have been, or have agreed to be married to each other.
- Are, have been, or have agreed to be in a civil partnership with each other.
- Are, or have been, in an intimate personal relationship with each other.
- Each have, or had, a parental relationship towards the same child.
- Are relatives.

EMN will recognise the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of domestic abuse. All staff will be aware of the signs of domestic abuse and follow the appropriate safeguarding procedures where concerns arise.

Homelessness

The DSL and deputy DSLs will be aware of the contact details and referral routes into the Local Housing Authority so that concerns over homelessness can be raised as early as possible.

Indicators that a family may be at risk of homelessness include:

- Household debt.
- Rent arrears.
- Domestic abuse.
- Anti-social behaviour.
- Any mention of a family moving home because “they have to”.

Referrals to the Local Housing Authority do not replace referrals to CSCS where a child is being harmed or at risk of harm.

Children Absent from Education/Setting

A child who is absent from nursery can be a vital warning sign of a range of safeguarding issues. EMN will ensure that the response to children persistently being absent from the setting supports identifying such abuse and helps prevent the risk of children becoming absent from education in the future. Staff will monitor children that are absent, particularly on repeat occasions and/or prolonged periods, and report them to the DSL following normal safeguarding procedures.

Child Abduction and Community Safety Incidents

For the purposes of this Policy, “child abduction” is defined as the unauthorised removal or retention of a child from a parent/carer or anyone with legal responsibility for the child. Child abduction can be committed by parents/carers and other relatives, other people known to the victim, and strangers.

All staff will be alert to community safety incidents taking place in the vicinity of the nursery that may raise concerns regarding child abduction, e.g. people loitering nearby or unknown adults conversing with children.

Children will be provided with practical advice and lessons to ensure they can keep themselves safe outdoors.

Child Criminal Exploitation (CCE)

For the purposes of this Policy, “child criminal exploitation” is defined as a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal activity, for any of the following reasons:

- In exchange for something the victim needs or wants
- For the financial advantage or other advantage of the perpetrator or facilitator
- Through violence or the threat of violence

Specific forms of CCE can include:

- Being forced or manipulated into transporting drugs or money through county lines.
- Working in cannabis factories.
- Shoplifting or pickpocketing.
- Committing vehicle crime.
- Committing, or threatening to commit, serious violence to others.

EMN will recognise that children involved in CCE are victims themselves, regardless of whether they have committed crimes, and even if the criminal activity appears consensual. EMN will also recognise that children of any gender are at risk of CCE.

Cyber-crime

For the purposes of this Policy, “cyber-crime” is defined as criminal activity committed using computers and/or the internet. This includes ‘cyber-enabled’ crimes, i.e. crimes that can happen offline but are enabled at scale and at speed online, and ‘cyber-dependent’ crimes, i.e. crimes that can be committed only by using a computer. Crimes include:

- Unauthorised access to computers, known as ‘hacking’.
- Denial of Service attacks, known as ‘booting’.
- Making, supplying or obtaining malicious software, or ‘malware’, e.g. viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence.

All staff will be aware of the signs of cyber-crime and follow the appropriate safeguarding procedures where concerns arise. This may include the DSL referring children to the National Crime Agency’s Cyber Choices programme.

Child Sexual Exploitation (CSE)

For the purposes of this Policy, “child sexual exploitation” is defined as a form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, for any of the following reasons:

- In exchange for something the victim needs or wants
- For the financial advantage, increased status or other advantage of the perpetrator or facilitator
- Through violence or the threat of violence

EMN will recognise that CSE can occur over time or be a one-off occurrence, and may happen without the child’s immediate knowledge, e.g. through others sharing videos or images of them on social media. The nursery will recognise that CSE can affect any child who has been coerced into engaging in sexual activities. The nursery will also recognise that children may not realise they are being exploited.

Staff will be aware of the key indicators that a child is the victim of CSE, including:

- Appearing with unexplained gifts, money or new possessions.
- Associating with other children involved in exploitation.
- Suffering from changes in emotional wellbeing.
- Misusing drugs or alcohol.
- Going missing for periods of time or regularly coming home late.
- Regularly becoming absent from school or education or not taking part.
- Having older partners.
- Suffering from sexually transmitted infections.
- Displaying sexual behaviours beyond expected sexual development.
- Becoming pregnant.

Where CSE, or the risk of it, is suspected, staff will discuss the case with the DSL. If after discussion a concern remains, local safeguarding procedures will be triggered, including referral to the LA. The LA and all other necessary authorities will then handle the matter to conclusion. The nursery will cooperate as needed.

Modern Slavery

For the purposes of this Policy, “modern slavery” encompasses human trafficking and slavery, servitude, and forced or compulsory labour. This can include CCE, CSE, and other forms of exploitation.

All staff will be aware of and alert to the signs that a child may be the victim of modern slavery. Staff will also be aware of the support available to victims of modern slavery and how to refer them to the National Referral Mechanism.

Female Genital Mutilation (FGM)

For the purposes of this Policy, “FGM” is defined as all procedures involving the partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

All staff will be alert to the possibility of a child being at risk of FGM, or already having suffered FGM. If staff are worried about someone who is at risk of FGM or who has been a victim of FGM, they are required to share this information with CSCS and/or the police. The nursery’s procedures relating to managing cases of FGM and protecting children will reflect multi-agency working arrangements.

All staff will be aware of the indicators that children may be at risk of FGM. While some individual indicators they may not indicate risk, the presence of two or more indicators could signal a risk to the child. It is important to note that the child may not yet be aware of the practice or that it may be conducted on them, so staff will be sensitive when broaching the subject.

Indicators that a child may be at heightened risk of undergoing FGM include:

- The socio-economic position of the family and their level of integration into UK society.
- The child coming from a community known to adopt FGM.
- Any girl with a mother or sister who has been subjected to FGM.

Indicators that FGM may take place soon include:

- When a female family elder is visiting from a country of origin.
- A girl confiding that she is to have a 'special procedure' or a ceremony to 'become a woman'.
- A girl requesting help from a teacher if she is aware or suspects that she is at immediate risk.
- A girl, or her family member, talking about a long holiday to her country of origin or another country where FGM is prevalent.

All staff will be vigilant to the signs that FGM has already taken place so that help can be offered, enquiries can be made to protect others, and criminal investigations can begin. Indicators that FGM may have already taken place include the child:

- Having difficulty walking, sitting or standing.
- Spending longer than normal in the bathroom or toilet.
- Spending long periods of time away from a classroom during the day with bladder or menstrual problems.
- Having prolonged or repeated absences from school, followed by withdrawal or depression.
- Being reluctant to undergo normal medical examinations.
- Asking for help, but not being explicit about the problem due to embarrassment or fear.

FGM is included in the definition of so-called "honour-based" abuse (HBA)", which involves crimes that have been committed to defend the honour of the family and/or community. All forms of HBA are forms of abuse and will be treated and escalated as such. Staff will be alert to the signs of HBA, including concerns that a child is at risk of HBA, or has already suffered from HBA, and will consult with the DSL who will activate local safeguarding procedures if concerns arise.

Virginity Testing and Hymenoplasty

Under the Health and Care Act 2022, it is illegal to carry out, offer or aid and abet virginity testing or hymenoplasty in any part of the UK. It is also illegal for UK nationals and residents to do these things outside the UK.

Virginity testing - Also known as hymen, '2-finger' or vaginal examination, this is defined as any examination (with or without contact) of the female genitalia intended to establish if vaginal intercourse has taken place. This is irrespective of whether consent has been given. Vaginal examination has no established scientific merit or clinical indication.

Hymenoplasty - A procedure which can involve a number of different techniques, but typically involving stitching or surgery, undertaken to reconstruct a hymen with the intent that the person bleeds the next time they have vaginal intercourse. Hymenoplasty is different to procedures that may be performed for clinical reasons, e.g. surgery to address discomfort or menstrual complications.

Virginity testing and hymenoplasty are forms of violence against women and girls and are part of the cycle of HBA, and can be precursors to child or forced marriage and other forms of family and/or community coercive behaviours, including physical and emotional control. Victims are pressurised into undergoing these procedures, often by family members or their intended husbands' family to fulfil the requirement that a woman remains 'pure' before marriage. Those who 'fail' to meet this requirement are likely to suffer further abuse, including emotional and physical abuse, disownment and even honour killings.

The procedures are degrading and intrusive, and can result in extreme psychological trauma, provoking conditions such as anxiety, depression and PTSD, as well as physical harm and medical complications. Staff will be alert to the possible presence of stress, anxiety and other psychological or behavioural signs, and mental health support should be made available where appropriate.

Victims face barriers in coming forward, e.g. they may not know that the abuse was abnormal or wrong at the time, and may feel shameful, having been taught that speaking out against family and/or the community is wrong, or being scared about the repercussions of speaking out.

Children aged 13 and older are considered to be most at risk, but it can affect those as young as 8, and anyone with female genitalia can be a victim regardless of age, gender identity, ethnicity, sexuality, religion, disability or socioeconomic status.

All staff will be aware of the following indicators that a child is at risk of or has been subjected to a virginity test and/or hymenoplasty:

- A child is known to have requested either procedure or asks for help.
- Family members disclose that the child has already undergone the practices.
- Pain and discomfort after the procedures, e.g. difficulty in walking or sitting for a long period of time which was not a problem previously.
- Concern from family members that the child is in a relationship, or plans for them to be married.
- A close relative has been threatened with either procedure or has already been subjected to one.
- A child has already experienced or is at risk of other forms of HBA.
- A child is already known to social services in relation to other safeguarding issues.
- A child discloses other concerns that could be an indication of abuse, e.g. they may state that they do not feel safe at home, that family members will not let them out the house and/or that family members are controlling.
- A child displays signs of trauma and an increase in emotional and psychological needs, e.g. withdrawal, anxiety, depression, or significant change in behaviour.
- A child appears fearful of their family or a particular family member.
- Unexplained absence from school, potentially to go abroad.
- Changes in behaviour, e.g. a deterioration in schoolwork, attendance, or attainment.

The above list is not exhaustive, but if any of these indicators are identified, staff members will immediately raise concerns with the DSL. An assessment of the risk they face will be undertaken. If there is believed to be immediate danger, the police will be contacted without delay.

EMN will not involve families and community members in cases involving virginity testing and hymenoplasty, including trying to mediate with family or using a community member as an interpreter, as this may increase the risk of harm to the child, including expediting arrangements for the procedure.

Forced Marriage

Forced marriage is a crime. It is a form of abuse directed towards a child or vulnerable adult, including adults who are forced into marriage against their free will.

Forced marriage is a marriage where one or both spouses do not consent to the marriage but are coerced into it. Force can be physical, psychological, financial, sexual and emotional pressure. Forced marriage can be committed if a person lacks capacity, whether or not coercion plays a part.

Under the Anti-social Behaviour, Crime and Policing Act 2014 a person commits an offence if he or she uses violence, threats or any other form of coercion for the purpose of causing another person to enter into a marriage and believes, or ought reasonably to believe, that the conduct may cause the other person to enter into the marriage without free and full consent.

It is an offence to do anything intended to cause a child to marry before the child's eighteenth birthday, whether or not the conduct amounts to violence, threats, or any other form of coercion or deception. This applies to non-binding, unofficial 'marriages' as well as legal marriages.

All staff will be alert to the indicators that a child is at risk of, or has undergone, forced marriage, including, but not limited to, the child:

- Being absent from school – particularly where this is persistent.
- Requesting for extended leave of absence and failure to return from visits to country of origin.
- Being fearful about forthcoming school holidays.

- Being subjected to surveillance by siblings or cousins at school.
- Demonstrating a decline in behaviour, engagement, performance, exam results or punctuality.
- Being withdrawn from school by their parents/carers.
- Being removed from a day centre when they have a physical or learning disability.
- Not being allowed to attend extracurricular activities.
- Suddenly announcing that they are engaged to a stranger, e.g. to friends or on social media.
- Having a family history of forced marriage, e.g. their older siblings have been forced to marry.
- Being prevented from going on to further or higher education.
- Showing signs of mental health disorders and behaviours, e.g. depression, self-harm, anorexia.
- Displaying a sudden decline in their educational performance, aspirations or motivation.

Staff who have any concerns regarding a child who may have undergone, is currently undergoing, or is at risk of forced marriage will speak to the DSL and local safeguarding procedures will be followed – this could include referral to CSCS, the police or the Forced Marriage Unit. The DSL will ensure the child is spoken to privately about these concerns and further action taken as appropriate. Children will always be listened to and have their comments taken seriously.

It will be made clear to staff members that they should not approach the child's family or those with influence in the community, without the express consent of the child, as this will alert them to the concerns and may place the child in further danger.

Advice will be sought from the Forced Marriage Unit following any suspicion of forced marriage among children.

If a child is being forced to marry, or is fearful of being forced to, EMN will be especially vigilant for signs of mental health disorders and self-harm. The child will be supported by the DSL and senior mental health lead and referrals will be made on a case-by-case basis.

Staff members will make themselves aware of how they can support victims of forced marriage in order to respond to the victims needs at an early stage, and be aware of the practical help they can offer, e.g. referral to social services and local and national support groups.

Local child safeguarding procedures will be activated following concerns regarding forced marriage – EMN will use existing national and local protocols for multi-agency liaison with police and children's social care.

EMN will support any victims to seek help by:

- Making them aware of their rights and choices to seek legal advice and representation.
- Recording injuries and making referrals for medical examination where necessary.
- Providing personal safety advice.
- Developing a safety plan in case they are seen, e.g. by preparing another reason for why the victim is seeking help.

EMN will establish where possible whether those at risk of forced marriage have a dual nationality or two passports.

EMN will aim to create an open environment where children feel comfortable and safe to discuss the problems they are facing – this means creating an environment where forced marriage is discussed openly within the curriculum and support and counselling are provided routinely.

Staff members will be educated about the issues surrounding forced marriage and the signs to look out for.

Radicalisation

For the purposes of this Policy, "radicalisation" refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

For the purposes of this Policy, “extremism” refers to the vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty, and the mutual respect and tolerance of different faiths and beliefs. Extremism also includes calling for the death of members of the armed forces.

For the purposes of this Policy, “terrorism” refers to an action that endangers or causes serious violence to a person or people, serious damage to property, or seriously interferes with or disrupts an electronic system. The use or threat of these actions must be designed to influence the government or intimidate the public, and be made for the purpose of advancing a political, religious or ideological cause.

Protecting children from the risk of radicalisation is part of the nursery’s wider safeguarding duties. EMN will actively assess the risk of children being radicalised and drawn into extremism and/or terrorism. Staff will be alert to changes in behaviour which could indicate that they may need help or protection. Staff will use their professional judgement to identify children who may be susceptible to extremist ideologies and radicalisation and act appropriately, which may include contacting the DSL or making a Prevent referral. EMN will work with local safeguarding arrangements as appropriate.

EMN will ensure that they engage with parents/carers and families, as they are in a key position to spot signs of radicalisation. In doing so, the nursery will assist and advise family members who raise concerns and provide information for support mechanisms. Any concerns over radicalisation will be discussed with the child’s parents/carers, unless EMN has reason to believe that the child would be placed at risk as a result.

The DSL will undertake Prevent awareness training to be able to provide advice and support to other staff on how to protect children against the risk of radicalisation. The DSL will hold formal training sessions with all members of staff to ensure they are aware of the risk indicators and their duties regarding preventing radicalisation.

The Prevent Duty

Under section 26 of the Counter-Terrorism and Security Act 2015, all schools are subject to a duty to have “due regard to the need to prevent people from being drawn into terrorism”, known as “the Prevent duty”. The Prevent duty will form part of the nursery’s wider safeguarding obligations.

EMN’s procedures for carrying out the Prevent duty, including how it will engage and implement the Channel programme, are outlined in the Prevent Duty Policy.

Children with Family Members in Prison

Children with a family member in prison will be offered pastoral support as necessary.

Children Required to Give Evidence in Court

Children required to give evidence in criminal courts, either for crimes committed against them or crimes they have witnessed, will be offered appropriate pastoral support.

Mental Health

All staff will be made aware that mental health problems can, in some cases, be an indicator that a child has suffered, or is at risk of suffering, abuse, neglect or exploitation.

Staff will not attempt to make a diagnosis of mental health problems – EMN will ensure this is done by a trained mental health professional. Staff will, however, be encouraged to identify children whose behaviour suggests they may be experiencing a mental health problem or may be at risk of developing one. Staff will also be aware of how children’s experiences can impact on their mental health, behaviour, and education.

Staff who have a mental health concern about a child that is also a safeguarding concern will act in line with this Policy and speak to the DSL or deputy DSL.

EMN will access a range of advice to help them identify children in need of additional mental health support, including working with external agencies.

Serious Violence

Through training, all staff will be made aware of the indicators which may signal a child is at risk from, or is involved with, serious violent crime.

These indicators include, but are not limited to:

- Increased absence from school.
- A change in friendships.
- Relationships with older individuals or groups.
- A significant decline in academic performance.
- Signs of self-harm.
- A significant change in wellbeing.
- Signs of assault.
- Unexplained injuries.
- Unexplained gifts or new possessions.

Staff will be made aware of some of the most significant risk factors that could increase a child's vulnerability to becoming involved in serious violence. These risk factors include, but are not limited to:

- Being male.
- Having been frequently absent from school.
- Having been permanently excluded from school.
- Having experienced child maltreatment.
- Having been involved in offending, such as theft or robbery.

Staff members who suspect a child may be vulnerable to, or involved in, serious violent crime will immediately report their concerns to the DSL.

We **all** have a statutory duty to 'safeguard and promote the welfare of children', this means:

- Protecting children from maltreatment;
- Preventing impairment of children's health or development;
- Ensuring that children are growing up in circumstances consistent with the provision of safe and effective care;
- Taking action to enable all children to have the best life chances.

If you have **any** concerns about the wellbeing and safety of a child or feel that something may be troubling them, you should share this information with the DSL straight away. Some issues e.g. a child's appearance, hygiene and general behaviour can be shared with the Room Leader.

However, if you think the matter is very serious and may be related to a child protection concern, e.g. physical, sexual, emotional abuse or neglect, you must report your concerns to the people below **immediately**:

Designated Safeguarding Lead (DSL)
Deputy Designated Safeguarding Lead (DDSL)
Consultant Designated Safeguarding Lead (CDSL)
Senior Consultant for Safeguarding (SCS)

Amie Stevens
Jessica Weeks
Olivia Cain
Collette Butler

Physical abuse is defined as a form of abuse which may involve actions such as hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical abuse can also be caused when a parent fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional abuse is defined as the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying, including cyberbullying, causing the child to frequently feel frightened or in danger, or the exploitation or corruption of children.

Sexual abuse is defined as abuse that involves forcing or enticing a child to take part in sexual activities, not necessarily involving violence, and regardless of whether the child is aware of what is happening. This may involve physical contact, it may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse.

Neglect is defined as the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in serious impairment of a child's health or development. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs. Neglect is the most common form of child abuse.

Child exploitation is defined as a form of abuse where an individual or group takes advantage of a power imbalance to coerce, manipulate, or deceive a child for their own gain. This gain can be financial, sexual, or for increased status.

Do not investigate or question the child yourself and do not discuss or seek advice from any other member of staff. Do not worry that you may be reporting small matters – we would rather that you tell us things which turn out to be small than miss a worrying situation.

Shortly after joining us you will receive full Safeguarding Training, however, in the interim, if you would like more information about policies and procedures about Safeguarding, please do not hesitate to ask.

Thank you for supporting and safeguarding the children at our nursery.