

CHILD PROTECTION POLICY – October 2025

Effective: 1 September 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.

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.

Key Contacts

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|--|-----------------|
| 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. 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:

- Parent Admission Policies & Information Booklet & Signature Agreement Booklet
- Staff Code of Conduct
- Keeping Children Safe in Education (Part 1)
- Low Level Safeguarding Concerns Policy & Reporting Form
- Allegations Against Staff of Abuse Policy
- Whistleblowing Policy
- Behaviour Policy
- Personal and Intimate Care Policy
- Accident, Incident and Emergency Policy
- Administering Medication Policy
- Food, Snack and Lunch Procedure
- Hygiene Policy
- Safer Eating Policy

2. 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 person 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.

As of early 2026, the Crime and Policing Act 2025 introduces a mandatory legal duty for practitioners to report known or suspected child sexual abuse. Failure to report is now a criminal offense, not just a policy breach.

3. Types of Abuse

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. 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

Non-Mobile Infants: Bruising on an infant who is not yet "cruising" (pulling themselves up) or walking is exceptionally rare and is considered a significant safeguarding concern. Such cases require an immediate referral to the DSL and Children’s Social Care, unless there is a pre-verified and documented medical condition.

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.

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:

When assessing a child's wellbeing, staff will monitor for physical, behavioural, and developmental red flags. These include, but are not limited to:

- **Physical Indicators:** Injuries or marks in unusual places (e.g. fleshy parts of the body) or those inconsistent with the child's developmental stage.
- **Behavioural Changes:** A child appearing unusually withdrawn, losing focus during play, or showing a sudden change in temperament.
- **Inappropriate Knowledge:** Sexualized play or language, and knowledge of adult themes that is significantly ahead of their chronological age.

- **Emotional Clues:** An extreme fear of abandonment, excessive "clinginess," or signs of low self-esteem and persistent sadness.
- **Regression:** Reverting to "younger" behaviours (e.g. sudden toileting accidents in a trained child or a loss of speech/language skills).

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.

4. Mobile Phones, Smart Technology and Image Use

Personal Device & Smart Technology Management

The most critical area for early years is the prevention of unauthorised image capture.

- **Staff Personal Mobiles:** A "zero-phone" rule while with children. Personal phones must be stored in a secure, designated area (e.g. staff lockers/office) during contact time.
- **Wearable Technology:** Smart Watches. Staff are permitted to wear smart watches but must ensure they are on Aeroplane Mode whenever present in the Nursery. Staff are prohibited from using smartwatches for messaging or photography during contact sessions.
- **Visitor/Parent Protocol:** Signage at the entrance states that mobile phones are not to be used in rooms where children are present. This includes parents during drop-off and pick-up.

Official Use of Technology

- **Setting-Owned Devices:** Only nursery-owned tablets/cameras are used for observations (e.g. Tapestry).
- **Image Storage:** Photos must be uploaded to the secure nursery system immediately and deleted from the device's local gallery. Devices must never leave the premises without senior management approval and must be password-protected.

Filtering and Monitoring

- **Filtering:** The Nursery uses a recognised provider to block inappropriate content.
- **Monitoring:** The DSL is the person named as responsible for overseeing the Nursery's "filtering and monitoring" systems. Systems are reviewed at least annually.
- **Wi-Fi Security:** Separate Wi-Fi networks for staff/office use and any guest/parent access.

Digital Literacy for Under-5s

- The focus is on "early prevention" rather than technical skills.
- **Safe Habits:** Teaching children to "Stop, Close, and Tell" an adult if they see something on a screen that makes them feel sad, scared, or confused.
- **The "Undressed" Rule:** Using age-appropriate resources (like NSPCC's PANTS resource) to teach children that they should never be undressed while on a screen or camera.

Parental Engagement

- **Acceptable Use Agreement:** Parents/carers are requested to sign an agreement on admission regarding the use of images (e.g. agreeing not to share photos from the Nursery's online portal on their personal social media).
- **Home Support:** The Nursery is fully committed to sharing online safety tips with parents/carers, especially regarding "sedentary screen time" (which the DfE recommends limiting to under 1 hour for ages 2–4).

5. Intimate Care and Nappy Changing

The Nursery is committed to ensuring that all staff responsible for the intimate care of children act professionally, sensitively, and in accordance with the child's individual needs. Intimate care is defined as any activity which involves washing, touching, or carrying out a procedure to intimate personal areas.

Fundamental Principles

- Right to Privacy: Every child has the right to privacy and dignity during nappy changing and intimate care.
- Consistency: Care will be delivered in a way that is consistent with the child's home routine where possible, provided it aligns with nursery safeguarding standards.
- Communication: Staff will always explain to the child what they are doing (e.g. "I am going to change your nappy now") to encourage cooperation and awareness of their own body.

Safeguarding Procedures for Staff

To protect both the child and the practitioner, the following protocols must be followed:

- Visibility: Nappy / clothes changing takes place in designated areas that provides the child with privacy from other children/visitors but remains visible or audible to other members of staff. Staff never change a child behind a locked door.
- Staffing: Only DBS-cleared permanent staff members are permitted to carry out intimate care. Volunteers and visitors are strictly prohibited from this task.
- "Two-Person" Awareness: While "two-to-one" changing is not always practical or necessary for every change, staff must alert a colleague before they take a child for intimate care.
- Recording: Every instance of intimate care or nappy changing is recorded, noting the time, the staff member involved, and any unusual observations (e.g. rashes or bruising).

Health and Hygiene

- Staff must wear disposable aprons and gloves for every change.
- Changing mats must be cleaned with the approved antibacterial solution before and after every use.
- Handwashing protocols must be strictly followed by staff after the procedure is complete.

Reporting Concerns

If a staff member notices any unusual marks, bruising, or swelling in the genital area during intimate care, they must:

- Complete the change professionally without drawing unnecessary attention to the mark.
- Report the observation immediately to the Designated Safeguarding Lead (DSL).
- Record the concern on a Body Map and a Safeguarding Concern Form.

If a child makes a comment during intimate care that causes concern (e.g. relating to their body or a touch they experienced elsewhere), this must be reported as a disclosure following the standard safeguarding procedure.

6. Sleep and Rest Protocols

The Nursery is committed to ensuring that all children can sleep safely, and we strictly adhere to Safer Sleep guidelines to reduce the risk of Sudden Infant Death Syndrome (SIDS) and other accidents.

To ensure maximum safety, staff conduct and record physical sleep checks every 10 minutes (or more frequently for younger infants), visually checking the child's breathing and skin colour.

Sleep rooms are maintained at an optimum temperature (between 16°C and 20°C).

Staff are prohibited from blocking viewing panels.

While baby monitors may be used as an additional aid, they are never a substitute for physical presence and manual checks. Regular physical checks (every 10 minutes) must be recorded.

A "two-person" awareness protocol is maintained to ensure that no adult is left alone with sleeping children behind closed doors without being audible or visible to the rest of the team.

7. Child-on-Child Harm & Positive Relationships

In the early years, we focus on "Kind Hands, Kind Feet" and "Problematic Sexual Behaviour" (PSB) rather than using adult terms like "harassment" or "violence" with the children.

We recognise that while children are learning to socialise, they may sometimes hurt one another. "Child-on-child harm" occurs when a child's behaviour goes beyond developmental "testing of boundaries" and causes persistent physical or emotional distress to another child. We maintain a zero-tolerance approach to all forms of bullying and harmful behaviour.

Staff are trained to distinguish between:

- Normal Developmental Play: e.g. accidental bumping, transitional biting (in younger toddlers), or natural curiosity about bodies.
- Harmful Behaviour: e.g. targeted hitting, persistent exclusion, or coercive "playing" that makes another child uncomfortable or scared.

Staff must remain "professionally curious" during play. We recognise that harmful behaviour can happen at any age and in any area of the nursery. Even if no incidents are reported, staff must monitor "quiet" children or changes in behaviour (e.g. a child becoming withdrawn or suddenly fearful of a specific peer). Any concerns must be discussed with the DSL immediately.

We do not dismiss harmful behaviour as "just a phase," "banter," or "boys being boys." We teach children from the earliest age that they have the right to say "No" or "Stop" and that their bodies belong to them.

Forms of Harm in the Nursery Context

- Physical: Targeted biting, hitting, or hair-pulling.
- Emotional: Persistent "meanness," deliberate exclusion from games, or discriminatory language.
- Problematic Sexual Behaviour: Coercive or age-inappropriate sexual play/curiosity that goes beyond normal exploration and makes another child distressed.

Empowering the Child: We teach our children how to keep themselves safe through:

- The "Stop" Rule: Encouraging children to use a clear hand signal and voice to set boundaries.
- Trusted Adults: Ensuring every child knows they can tell a "Grown-up" if they are sad, scared, or if a friend has been unkind, and that they will be listened to and helped.
- Kindness Curriculum: Using stories and "Circle Time" to model empathy and respectful play.

Responding to Incidents: When responding to child-on-child harm, staff will:

1. Intervene Immediately: Ensure the safety of the victim first.
2. Act Calmly: Use age-appropriate language to explain why the behaviour was not kind.
3. Support Both Children: The victim needs comfort and reassurance; the child displaying the behaviour needs support to understand boundaries and empathy.
4. Record and Report: All incidents are logged. If a pattern emerges, the DSL will involve parents and, if necessary, external early help services.

8. 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.

9. 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.

10. 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.

11. Concerns About Staff and Safeguarding Practices

Reporting Concerns About Staff

If a staff member, volunteer, or supply worker has concerns about another adult's conduct - either inside or outside the setting - that suggests they may be unsuitable to work with children, they must report this immediately to the Nursery Manager.

If the concern is about the Nursery Manager, then report to the EMN Liaison or CEO.

If the concern is about the CEO, then report to the Director.

Low Level Concern

A "low-level concern" is any concern - no matter how small, and even if it is no more than a "nagging doubt" - that an adult may have acted in a way that is inconsistent with the Staff Code of Conduct. This includes inappropriate conduct outside of work that does not meet the "harm threshold" for a LADO referral.

Examples of Low-Level Concerns:

- Being over-friendly with children.
- Having favourites.
- Using inappropriate language in the presence of children.
- Humiliating a child or using "shame" as a management tool.
- Inappropriate online / outside of work conduct.

Staff must be vigilant. If you observe behaviour that doesn't "feel right," you have a professional duty to report it. You do not need to have "proof"; the Nursery is responsible for investigating the validity. A dedicated reporting form exists to capture "niggles" or behaviours that do not meet the harm threshold.

Low-level safeguarding concerns will be handled under the Low-Level Safeguarding Concerns Policy.

Allegations of Abuse

Staff must report any colleague (including volunteers or contractors) who has:

- Harmed or may have harmed a child.
- Behaved in a way that indicates they pose a risk of harm.
- Behaved in a way that suggests they are unsuitable to work with children (including behaviour outside of work).
- Under the Crime and Policing Act 2025, staff have a legal duty to report known or suspected child sexual abuse. Failure to do so is a criminal offense.

The Nursery will contact the Local Authority Designated Officer (LADO) within one working day.

Ofsted will be notified of any serious allegation as soon as possible, and no later than 14 days.

A "Link Person" (independent of the investigation) will be appointed to support the welfare and mental health of any accused staff member.

At the conclusion of a LADO-coordinated investigation, the outcome will be categorised as:

- Substantiated: Evidence supports the allegation.
- Malicious: Clear evidence the accuser intended to deceive.
- False: Evidence disproves the allegation.
- Unsubstantiated/Unfounded: Insufficient evidence or no proper basis for the concern.

Allegations against staff will be managed in accordance with the setting's Allegations of Abuse Against Staff Policy.

Whistleblowing

Any concerns regarding general safeguarding practices at Eaton Mill Nursery should be raised with the Nursery Manager in the first instance.

If the concern involves the Manager, staff report the EMN Liaison or directly to the CEO.

If the concern involves the CEO, report to the Director.

Concerns will be handled under the Whistleblowing Policy.

If a staff member feels unable to raise a concern internally, or feels their concern has not been addressed, they should use external whistleblowing channels:

- NSPCC Whistleblowing Helpline: 0800 028 0285 / help@nspcc.org.uk
- Ofsted Whistleblowing: 0300 123 1231 / whistleblowing@ofsted.gov.uk

12. LADO

In Milton Keynes, the Local Authority Designated Officer (LADO) is the statutory lead for managing allegations against people who work or volunteer with children. For a nursery, the LADO is the essential partner whenever a staff member's conduct toward a child reaches a specific "harm threshold."

The LADO for Milton Keynes City Council (MKCC) does not investigate the nursery staff themselves; instead, they oversee and coordinate the multi-agency response.

When the Nursery Must Contact the LADO

The MKCC LADO must be informed within one working day if a member of staff or volunteer has:

- behaved in a way that has harmed, or may have harmed a child;
- possibly committed a criminal offence against or related to a child; or
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

Key Responsibilities of the MKC LADO

- Providing advice, information and guidance to employers and voluntary organisations around allegations and concerns regarding paid and unpaid workers.
- Managing and overseeing individual cases from all partner agencies.
- Ensuring the child's voice is heard and that they are safeguarded.
- Ensuring there is a consistent, fair and thorough process for all adults working with children and young people against whom an allegation is made.
- Monitoring the progress of cases to ensure they are dealt with as quickly as possible.
- Recommending a referral and chairing the strategy meeting in cases where the allegation requires investigation by police and/or social care.

There may be up to three strands in the consideration of an allegation:

- a police investigation of a possible criminal offence;
- enquiries and assessment by children's social care about whether a child is in need of protection or in need of services;
- consideration by an employer of disciplinary action in respect of the individual.

The LADO is involved from the initial phase of the allegation through to the conclusion of the case. The LADO is available to discuss any concerns and to assist in deciding whether to make a referral and/or take any immediate management action to protect a child.

| Service | Contact Information |
|--------------------|--|
| LADO Direct Line | 01908 254307 |
| LADO Email | LADO@milton-keynes.gov.uk |
| MASH (Urgent Harm) | 01908 253169 or 253170 |
| Out of Hours | 01908 265545 (Emergency Social Work Team) |

13. Attendance Monitoring and Emergency Contacts

In alignment with the EYFS Statutory Framework 2025 and the Working Together to Safeguard Children guidance, our setting maintains a culture of high vigilance regarding child attendance. We recognise that unexplained or prolonged absence can be an early indicator of safeguarding concerns or changes in a child's home circumstances.

Parents/carers are required to notify the nursery by 9:00 AM on the first day of any absence. If no notification is received, the Nursery Manager/Designated Safeguarding Lead or a member of the management team will initiate a follow-up call within one hour of the expected arrival time.

To facilitate this and ensure the safety of every child, we require a minimum of two emergency contact numbers (and where possible, three) for every child on roll. These contacts must be individuals who can be reached during nursery hours and who are authorised to collect the child if the primary caregivers are unavailable.

Should we be unable to establish the whereabouts or safety of a child after 48 hours of unexplained absence - or immediately if the child is considered vulnerable or subject to a Child Protection or Child In Need Plan - we will follow local Milton Keynes MASH protocols and may request a police welfare check.

14. 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.

15. Early Help

Early help means providing support as soon as a problem emerges, at any point in a child's life. In a nursery setting, this often involves identifying developmental delays or family stresses before the child transitions to formal schooling. Any child may benefit from early help, but staff will be particularly alert to the potential need for early help for children who:

- Have SEND or Additional Needs: Children with disabilities, complex health conditions, or Special Educational Needs (SEND), regardless of whether they have a statutory Education, Health and Care (EHC) plan.
- Show Emotional or Behavioural Concerns: Children struggling with self-regulation, attachment, or showing signs of early mental health needs.
- Are at Risk of Exploitation: Children living in environments where they may be at risk of radicalisation or criminal exploitation (including through the activities of older siblings or parents).
- Are Affected by the Justice System: Children with family members in custody or prison, or who are affected by parental offending.
- Face Challenging Home Circumstances: Families experiencing drug and alcohol misuse, adult mental health problems, or domestic abuse.
- Are "Care Experienced": Children who have returned home to their family from care, or who are "Looked After."
- Are at Risk of "Honour-Based" Abuse: Children at risk of Female Genital Mutilation (FGM).
- Are Privately Fostered: Children being cared for by someone other than a close relative for 28 days or more.

- Show Inconsistent Attendance: Children who are persistently absent from the nursery without a medical reason, as this can be an early indicator of wider family struggles or neglect.
- Show Developmental Red Flags: Children showing early signs of neglect, such as arriving consistently hungry, in soiled clothing, or failing to meet developmental milestones without an underlying medical cause, loss of play skills, developmental regression.

The Nursery will not limit its support to the categories above and will be mindful of other circumstances where a child may benefit from early help, such as:

- Bereavement or Loss: Including the separation of parents.
- Digital Exposure: Children who have been exposed to inappropriate or "adult" online content via shared family devices.

All staff are expected to use professional curiosity - looking past the obvious and asking respectful questions - to identify when a family may be struggling. Any concerns must be raised immediately to the Designated Safeguarding Lead (DSL).

The DSL will take the lead when early help is appropriate. This includes:

- Liaising with Health Visitors, Speech and Language Therapists, and local Children's Centres.
- Initiating or contributing to an inter-agency assessment (e.g. an Early Help Assessment Tool).
- Acting as the "Lead Practitioner" where appropriate to coordinate support for the family.

Early help cases will be kept under constant review. If the child's situation does not improve, or if the risk increases, the DSL will escalate the concern to Children's Social Care Services (CSCS) for a statutory assessment.

16. 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.

17. 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.

18. 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 learning 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.

19. 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.

20. Safer Recruitment

Safer recruitment in a nursery setting is governed by the Early Years Foundation Stage (EYFS) 2025 framework and Keeping Children Safe in Education (KCSIE).

The 2025 update specifically strengthened the requirements around references and safeguarding training, ensuring that no individual begins work without a verified professional history.

A. Pre-Interview Stage

Safer recruitment begins before the employer meets a candidate.

- Job Advert: Includes a clear statement about the setting's commitment to safeguarding and that the post is subject to an Enhanced DBS check.
- Job Description & Person Specification: Explicitly states the staff member's responsibility for safeguarding and promoting the welfare of children.
- Application Forms: CV's alone are not accepted. A standardised application form is required to ensure a full, chronological employment history is captured.
- Self-Declaration: Shortlisted candidates should complete a self-declaration form regarding their criminal record and any "disqualification by association" (where applicable).

B. The Interview & Scrutiny

- Gap Analysis: Employers scrutinise the application for any gaps in employment. Any gaps (even a few months) must be explained and the explanation recorded.
- The Interview Panel: At least one member of the interview panel must have completed formal Safer Recruitment Training.
- Safeguarding Questions: The interview must include specific questions to test the candidate's attitudes toward children, their understanding of boundaries, and their knowledge of safeguarding procedures.

C. Mandatory Vetting Checks

Under the 2025 EYFS framework, these checks are completed and recorded on the setting's Single Central Record (SCR) before the individual starts:

| Check Type | Requirement |
|----------------------------|---|
| Identity Check | Verify birth certificate, passport/photo ID, and proof of address. |
| Right to Work | Confirm legal status to work in the UK. |
| Enhanced DBS | Must include a Children's Barred List check. |
| References | Mandatory: Employer must obtain at least two references <i>before</i> employment begins. One must be from the most recent employer and have been completed by a senior person with appropriate authority. References from family members are not permitted. |
| Overseas Checks | If a candidate has lived or worked abroad, employer must seek an equivalent "Certificate of Good Conduct" from that country. |
| Qualification Check | Verify original certificates for mandatory roles (e.g., Level 3 Early Years Educator, Paediatric First Aid). |
| Medical Fitness | A self-declaration or occupational health check to ensure they are mentally and physically fit for the role. |

D. Post-Appointment & Induction

- Probationary Period: All new staff have a structured probation period with regular "supervisions."
- Safeguarding Induction: On day one, staff must be trained on:
 - EMN's Child Protection Policy
 - The Staff Code of Conduct
 - The role of the Designated Safeguarding Lead (DSL).
 - Whistleblowing Policy
- Ongoing Suitability: Staff sign an annual suitability declaration.

Trainees and Volunteers

Trainees and regular volunteers are treated with the same level of scrutiny as a paid employee during recruitment.

- Enhanced DBS with Barred List: Any trainee or volunteer in "regulated activity" (working regularly, unsupervised, or overnight) must have an Enhanced DBS check.
 - *Note:* EMN cannot obtain a DBS check for anyone under the age of 16 (e.g. school work experience students).
- References: EMN must obtain and verify references for volunteers and students before they start. For students, this usually comes from their tutor or training provider.
- Risk Assessments: For "one-off" volunteers (like a parent helping at a summer fair) who do not have a DBS, EMN must conduct a written risk assessment and they must **never** be left unsupervised with children.

Staff Ratios & First Aid

- Mandatory PFA: Students (17+), apprentices (16+), and volunteers (17+) must hold a valid Paediatric First Aid (PFA) certificate to be counted in ratios.
- Competency: Even with a PFA certificate, the manager must deem them "competent and responsible" before they are included in the headcount.

Safeguarding Induction (Day One)

Before they interact with children, every trainee, student, or volunteer must receive a formal safeguarding induction. This is not optional. It must cover:

- The "Big Three" Documents: They must read and sign to say they understand:
 1. The setting's Child Protection/Safeguarding Policy.
 2. The Staff Code of Conduct (including mobile phone and social media use).
 3. The Whistleblowing Policy.
- The DSL: They must know exactly who the Designated Safeguarding Lead (DSL) is and how to find them immediately.
- Identifying Signs: Training on how to spot signs of abuse, neglect, and "low-level concerns" regarding other adults in the setting.

Operational Protocols

To protect both the children and the trainee/volunteer, specific operational boundaries must be in place:

| Protocol | Requirement |
|---------------|--|
| Supervision | Unless they are fully vetted and qualified (and even then, for a period of induction), they should not be left alone with a child. |
| Intimate Care | Students and volunteers do not carry out nappy changes or assist with toileting unless it is a specific requirement of their qualification (and then only under supervision). |
| Mobile Phones | Strict "no phones in rooms" policy applies. Phones should be kept in a locker or the staff room. |
| Reporting | They must be told: " <i>If you see something, say something.</i> " They should report concerns directly to the DSL, not to their college tutor first. |

21. 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.

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 trainees / apprentices / students / volunteers, this will also be recorded on the SCR.

22. 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.

23. Training

All staff at our nursery undergo a mandatory safeguarding induction on their first working day, which includes a thorough briefing on our specific child protection procedures, the Staff Code of Conduct, and the role of the Designated Safeguarding Lead (DSL).

All practitioners, including volunteers and students, complete formal Level 2 safeguarding training that aligns with the Annex C criteria set out in the EYFS national framework. This training is renewed every two years at a minimum.

DSL Specific Training: The DSL and deputies have additional Level 3 training that includes building a safe culture, safer recruitment, and managing allegations against adults.

Beyond formal sessions, we foster a culture of continuous learning through monthly safeguarding 'refresher' updates, staff meeting briefings, and supervision sessions and scenario-based discussions.

Our training specifically details how staff are supported to put their knowledge into practice, ensuring they can confidently identify early indicators of harm, manage disclosures, and understand their duty regarding the Prevent Duty, Online Safety, and Whistleblowing.

Records of all training, including the delivery method and date of completion, are maintained in a central tracker to ensure 100% compliance across the team.

In-House Training:

- Safeguarding Induction: Tailoring the setting's specific policies, the Staff Code of Conduct, and local referral pathways for new starters.
- Refresher Sessions: Weekly / Monthly "safeguarding bites" during staff meetings (e.g. discussing a new "Low-Level Concerns" policy or a case study).
- Policy Briefings: When legislation changes, the DSL briefs the team on the new requirements.
- Scenario-Based Learning: Testing staff knowledge with "What would you do if...?" scenarios to ensure they can put theory into practice.
- Online safety and digital risks relevant to under-5s, including exposure to inappropriate content and the nursery's specific filtering and monitoring systems.

External Training:

- Level 3 DSL Training
- Certified Qualifications
- Paediatric First Aid (PFA)
- Prevent Duty

24. 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.

All staff counting in ratios - including students and apprentices - must hold a valid Paediatric First Aid (PFA) certificate.

At least one person who has a current 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.

Nursery Ratios

Children must be within sight and/or hearing of staff. 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.

25. 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) | 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.

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 and Debbie Young

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:

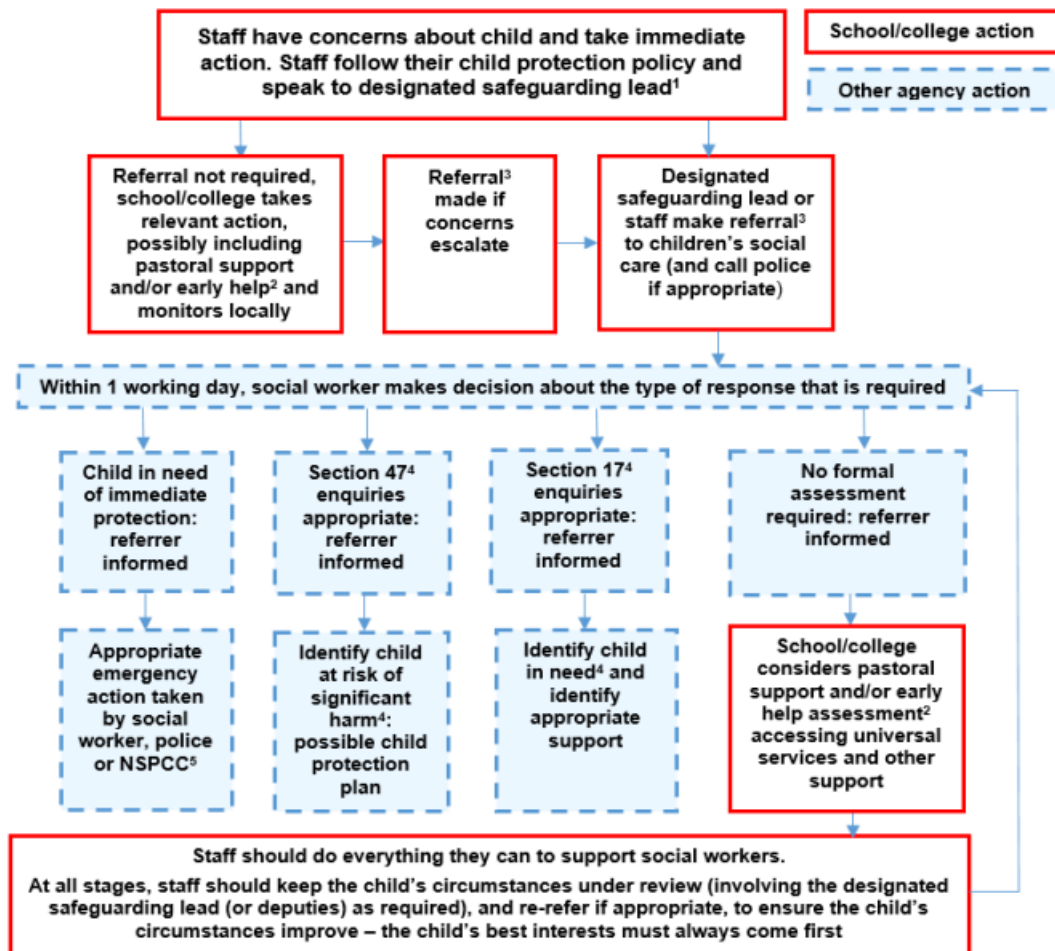
Prevent Duty Referrals

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
- Absent children
- Child abduction and community safety incidents
- Child criminal exploitation (CCE)
- Child sexual exploitation (CSE)
- Modern slavery
- FGM
- Forced marriage
- Radicalisation
- Children with family members in prison
- Mental health

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 the 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.

We adhere to strict supervision ratios and site security protocols to prevent unauthorised departure. Children are taught age-appropriate safety rules (e.g. holding hands) during outings.

Child Criminal Exploitation (CCE)

In a nursery setting, Child Criminal Exploitation (CCE) occurs when an adult or older child takes advantage of a young child's vulnerability to facilitate criminal activity. We recognise that infants and toddlers cannot "consent" to these activities and are victims of abuse, regardless of how "normal" the situation may appear to the child.

While young children are not active participants in crime (such as shoplifting or vehicle theft), they are frequently exploited in the following ways:

- "Muling" and Transport: Very young children or infants in strollers may be used by adults to transport drugs, weapons, or illicit money (often linked to County Lines), as adults believe they are less likely to be stopped or searched by police while with a child.
- Decoys/Shields: Using a child to provide a "family" appearance to hide criminal meetings or activities.
- Production Environments: Living in or being present in dangerous environments where illegal substances are produced (e.g., cannabis farms or "trap houses").

Staff should be alert to indicators that a family may be involved in exploitation:

- Unexplained Wealth: A child arriving with high-end designer clothing or expensive toys that do not match the family's known circumstances.
- Frequent Travel: Mention of the child going on long, unexplained "trips" to other towns or cities.
- Physical Safety: Signs of neglect or physical marks that may occur if a child is being taken into dangerous, unstable environments.
- Behavioural Changes: A child who seems unusually fearful of "uniforms" or police, or who repeats adult language regarding "hiding" things or "staying quiet."
- Parental Behaviour: Parents who appear under duress, are frequently visited by unknown adults at the nursery gates, or who use multiple different phones.

Child Sexual Exploitation (CSE)

In the Early Years, Child Sexual Exploitation (CSE) is a form of sexual abuse where an adult or older child takes advantage of a power imbalance to involve a young child in sexual activity. We recognise that infants and toddlers are particularly vulnerable as they cannot understand or consent to these actions and rely entirely on adults for protection.

Staff must remain alert to signs that differ significantly from those seen in older children. Key indicators in a nursery setting include:

- Sexualized Play or Language: Displaying sexual behaviours, knowledge, or language that is clearly beyond their expected developmental stage.

- Unexplained Gifts: A child arriving with new toys, clothes, or treats that the parents cannot account for.
- Physical Indicators: Frequent or unexplained redness, soreness, or injury in the genital area (noticed during nappy changes or toileting).
- Behavioural Regressions: Sudden changes in emotional wellbeing, such as becoming excessively "clingy," withdrawn, or showing extreme distress during personal care routines.
- Online/Digital Risk: Concerns that an adult is using the child for the production of sexual images (e.g., parents or carers taking inappropriate photos).
- Grooming Signs: An adult outside the family showing an unusual or obsessive interest in a specific child.

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.
- Having prolonged or repeated absences from nursery, followed by withdrawal or change in emotional presentation.
- Being reluctant to undergo normal medical examinations / nappy changes.

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.

Forced Marriage

Forced marriage is a criminal offense and a form of abuse where a person is married without their full and free consent. While it is illegal to marry any child under 18, in a nursery setting, we focus on "Promised Marriages" (where a child is pledged to marry in the future) and the use of the child as a pawn in family coercive control.

Staff must be alert to indicators that may suggest a child is at risk of being taken abroad for a promised marriage or is living in a home where forced marriage is a threat:

- Persistent Absence: Unexplained or frequent absences from the nursery.
- Extended "Holiday" Requests: Parents requesting long leaves of absence to the family's country of origin, or a failure to return on the agreed date.
- Family History: Knowledge that an older sibling or relative has been forced into marriage or has "disappeared" from education.
- Changes in Parental Behaviour: Parents appearing secretive, under pressure from extended family, or discussing "arrangements" for the child's future in restrictive terms.
- Disclosure of "Special Trips": A child mentioning they are going away for a "party," a "wedding," or a "special ceremony" to "become a big girl/boy" (this can also overlap with FGM risk).

Staff may only have one chance to speak to a child or spot a concern before they are taken out of the country.

- Professional Curiosity: If a parent mentions a long trip to a country where forced marriage is prevalent, staff should discuss this with the DSL immediately.
- Do Not Contact the Family: If forced marriage is suspected, staff must not approach the family or community members. Doing so can alert them to the nursery's concerns and drastically increase the danger to the child, potentially accelerating plans to move the child.

Radicalisation

The setting has a statutory "Prevent Duty" to protect children from being drawn into terrorism. In a nursery context, "radicalisation" is the process by which a child is exposed to extremist ideologies by adults or older siblings, which may lead to a distorted worldview or potential harm.

In the early years, we prevent radicalisation primarily by embedding Fundamental British Values into our daily curriculum in an age-appropriate way:

- Democracy: Making decisions together, such as voting on which story to read.
- The Rule of Law: Understanding that we have "Golden Rules" to keep us safe and fair.
- Individual Liberty: Encouraging children to have self-confidence and make their own choices.
- Mutual Respect and Tolerance: Celebrating different faiths, cultures, and family structures, and teaching "kind hands" and "kind words."

While toddlers do not typically hold extremist views, staff must be alert to indicators that a child's home environment may be radicalising them:

- Imitative Play or Speech: A child repeating extremist language, hate speech, or "them vs. us" narratives overheard at home.
- Parental Concerns: Parents or carers expressing extremist views, accessing illegal online content in the presence of the child, or showing sudden changes in behaviour/associations.
- Vulnerability to Influence: Children whose families are isolated or experiencing a crisis may be more susceptible to influence from extremist groups offering support.
- Changes in Appearance or Behaviour: Sudden, significant changes in a child's behaviour or a family's willingness to engage with the nursery's inclusive curriculum.

Children with Family Members in Prison

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

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.

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) | Amie Stevens |
| Deputy Designated Safeguarding Lead (DDSL) | Jessica Weeks |
| Consultant Designated Safeguarding Lead (CDSL) | Olivia Cain |
| Senior Consultant for Safeguarding (SCS) | 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.

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.