Safeguarding and Child Protection Policy

Holy Trinity Ladybirds

2026

Policy reviewed	August 2026	
Date approved by LAC	October 2026	
Next review date	August 2027	

Key Personnel

Role	Name	Contact details
Trust Headteacher	Rob Kenyon	Kenyon.r@holytrinitycepa.co.uk
Manager	Mel Wright	Wright.m@holytrinitycepa.co.uk
Designated Safeguarding Lead (DSL)*/**	Rob Kenyon	Kenyon.r@holytrinitycepa.co.uk
Deputy DSL(s)*/**	Mel Wright	Wright.m@holytrinitycepa.co.uk
	Wendy Richards	Admin@holytrinitycepa.co.uk
	Nat New (Pre School)	Admina@holytrinitycepa.co.uk
	Laura Thompstone (SEND hub)	Admin@holytrinitycepa.co.uk
	Beth Bryant (Part time)	Admin@holytrinitycepa.co.uk

Special Educational Needs Coordinator (SENCO)	Beth Bryant (Part time)	Bryant.b@holytrinitycepa.co.uk
EYFS SEND and Inclusion Lead	Cheryl Meddins	
Chair of LAC	P Darlington	Darlington.p@holytrinitycepa.co.uk

**Out of hours contact details will be made available to staff*
***Any changes to key personnel/holiday/emergency contacts will be shared with the appropriate agencies and Safeguarding Partnerships.*

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Policy Scope and Aims

This policy applies to anyone working on behalf of *Holy Trinity Ladybirds* including the Trust Headteacher, Manager and the LAC, staff, volunteers, contractors, agency staff and students.

The policy is publicly available on the website so that it can be accessible for our children; their families and anyone visiting and /or working with us.

The policy aims to meet the requirements as outlined in Part 2 Keeping children safe in education - GOV.UK and Part 3 Early years foundation stage (EYFS) statutory framework - GOV.UK.

Safeguarding Statement

We believe that:

- All children have the right to protection from all types of abuse, neglect, exploitation and / or harm.
- Everyone has a responsibility to promote the welfare of all children and young people, to keep them safe and to practice in a way that protects them.

This means that we will:

- Not tolerate the abuse, neglect or exploitation of children. This includes never accepting, dismissing or tolerating and always challenging or raising concerns about words or actions which downplay, justify, or promote discrimination, abuse, neglect, exploitation and / or harm.
- Be child centred [1]and ensure that we consider the best interests of children in everything that we do. This includes ensuring that we enable children's voices and experiences to be heard (using communication tools and advocacy if necessary); and that children are involved in and informed about the decisions being made about them.
- Ensure we provide a safe environment for children to learn, grow and develop and feel able to raise any concerns they may have for themselves or others.
- Look out for and respond promptly and appropriately to all identified concerns, incidents or allegations of abuse, neglect exploitation and / or harm of a child.
- Ensure no child/ family or group of children/ families are treated less favourably by us than others. This means being inclusive, anti-discriminatory and responsive to all children and families.
- Recognise that bias can be a barrier to safeguarding practice including professional curiosity; which can adversely impact children in some groups or communities.
- Take extra positive actions that may be needed to safeguard and promote the welfare of a child(ren) who we know are more vulnerable to experiencing abuse, neglect, exploitation and / or harm or discrimination.
- Work in partnership with our children, their parents, carers, and other agencies.

Key Terms

Safeguarding and promoting the welfare of children is defined in Working Together to Safeguard Children as:

- providing help and support to meet the needs of children as soon as problems emerge

[1] See Working Together to Safeguard Children: Chapter 1: A child centred approach

- protecting children from maltreatment, whether this is within or outside of 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; and
- taking action to enable all children to have the best outcomes[2]:

Child Protection is a part of safeguarding and promoting welfare. It refers to the specific activity that is undertaken to protect specific children who are suspected to be suffering, or are likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm.

Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including physical abuse, sexual abuse, emotional and psychological abuse, coercive and controlling behaviour and economic or financial abuse, including where they see, hear, or experiences its effects.

Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others.

Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults, or another child or children. This includes in teenage relationships, or under the guise of 'honour' based abuse including forced marriage and female genital mutilation, or abuse related to faith or belief such as allegations of demonic possession.

There are several types of abuse and safeguarding issues that could increase the risk that a child could be abused. See Part 1, Part 5 and Annex B of Keeping Children Safe in Education.

Staff refers to all those working for or on behalf of the setting full or part time, temporary or permanent in either a paid or voluntary capacity. The exception to this term is Committee members/Trustees.

Child includes everyone under the age of 18.

A **Parent** refers to birth parents and others who have parental responsibility (as defined by the Children's Act 1989) or has care of a child.[3]

Data protection laws refer collectively to the Data Protection Act 2018, the UK General Data Protection Regulation (UK GDPR), and the Data (Use and Access) Act 2025.

Legislation, Standards and Guidance

[2] Children's social care: national framework - GOV.UK (www.gov.uk)

[3] S576 Education Act 1996

This policy is based on the following legislation, guidance, standards, and procedures, and any legislation or guidance (statutory or non-statutory) outlined or referenced within it.

Legislation	Statutory National Guidance/Standards	Local Procedures
• Children Act 2004 • Children's Wellbeing and School's Act 2026	• Keeping Children Safe in Education • Early years foundation stage (EYFS) statutory framework • Working Together to Safeguard Children	• Shropshire Safeguarding Community Partnership Family Help Together - A Framework for Action • Shropshire Safeguarding Community Partnership West Midlands Safeguarding Children Procedures • Shropshire Safeguarding Community Partnership. Allegations about staff/volunteers

Linked Policies

• EYFS Positive behaviour policy • Staff Code of Conduct • Mobile Phone/ Devices policy • Whistleblowing • Health & Safety • • Attendance • Curriculum • Complaints • SEND	• Administration of first aid/medicines • Online Safety, including staff use of mobile phones/ devices with imagery and sharing capacity. • Risk Assessments • Safer Recruitment • Disciplinary and grievance • Intimate Care • Preventing Radicalisation • Data Protection/GDPR Guidance

Roles and Responsibilities

- We follow the statutory guidance as set out in Early years foundation stage (EYFS) statutory framework and Keeping Children Safe in Education (and associated documents and guidance); adhering to the roles and responsibilities and expectations identified for:

The LAC, Nursery Manager & Trust Headteacher/DSL:

Have a strategic leadership responsibility for ensuring we take a whole setting approach to safeguarding arrangements as outlined in this policy and that we comply with our duties under Legislation and Guidance.

To have oversight of safeguarding arrangements; regularly meeting with the Designated Safeguarding Lead *each half term* and reporting back to the LAC through a report.

The Chair of the LAC will liaise with the Local Authority/Trust in the event of an allegation of abuse made against the Manager or Trust Headteacher in line with Ensuring safe staff.

All LAC members will ensure:

- The setting has a Designated Safeguarding Lead who has the appropriate, authority, skills and experience to carry out duties of the post and is provided with the time, funding, resources, and support needed to carry out their role effectively.
- Continuity of safeguarding responsibilities if the Designated Safeguarding Lead is unavailable due to illness, leave, or other circumstances.
- The setting has safeguarding policies and procedures in place that are implemented effectively and comply with our duties under Legislation, Standards and Guidance at all times.

- All staff and committee members are knowledgeable and confident in carrying out their safeguarding duties in line with Professional development and support.
- That the effectiveness and implementation of safeguarding arrangements are robustly overseen by the Trust Headteacher, Nursery Manager & St Chads

The Trust Headteacher & Nursery Manager:

Is responsible (with the lead support of the Designated Safeguarding Lead) for ensuring safeguarding arrangements are implemented effectively in setting.

This includes**:**

- Having the overarching responsibility of ensuring the effectiveness of our setting safeguarding arrangements as outlined in this policy.
- Being accountable and reporting to the LAC (with the support of the Designated Safeguarding Lead) on the effectiveness of setting safeguarding arrangements.
- Supporting and promoting a whole setting safeguarding culture and ethos as outlined in our Safeguarding Statement.
- Take the lead role in Ensuring Safe Practice; including ensuring staff and knowledgeable and confident in their safeguarding practice; including making sure that their practice is in line with national and local requirements. The Manager/Trust Headteacher is also the lead person responsible for receiving, managing, and referring to/liaising with the Local Authority Designated Officer (with the support of the Designated Safeguarding Lead) or any other authorities regarding allegations of abuse made against staff or other organisations/individual who use setting premises.
- Enabling the Designated Safeguarding Lead and any deputies to carry out their roles effectively. This means ensuring that they have the appropriate status, authority, skills and experience to carry out duties of the post and are given sufficient time, training, support, resources.
- Ensuring that all setting policies including safeguarding policies and procedures and those required to be in place, are implemented and followed by all staff.
- Ensuring they notify Ofsted of any changes as outlined in Early Years Foundation Stage Statutory Framework
- Ensuring they notify the local authority of any significant events as outlined in Protocol for notifying the local authority of significant events and changes.docx
- Ensuring that setting policies and procedures relating to site safety and health and safety guidance and relevant legislation are in place and adhered to under Legislation, Standards and Guidance at all times.

The Designated Safeguarding Lead (DSL):

Takes the lead responsibility for safeguarding and child protection in our setting Annex B Keeping children safe in education outlines their key responsibilities. *Include the next sentence if you have them:* Our Deputy Designated Safeguarding Lead(s) (hereafter referred to as DDSL) support the Designated Safeguarding Lead in the discharge of their responsibilities.

Responsibilities include:

- Ensuring that the setting has a child protection policy is in place as required by Keeping children safe in education and Early years foundation stage (EYFS) statutory framework , that is implemented and followed by all staff.
- Being available to deal with safeguarding and child protection during setting hours. Requests will be answered by phone or email admin@holytrinitycepa.co.uk
- Acting as the point of contact with whom to raise safeguarding concerns within (including those raised by the setting filtering and monitoring system) and to our setting
- Supporting the Trust Headteacher and Manager to Ensure Safe Practice in setting.
- Managing safeguarding referrals to the Local Authority; Police, relevant local safeguarding partners and any other statutory authorities or multi-agency risk management arrangements.
- Working closely with the manager to ensure a whole setting safeguarding culture and ethos.

- Acting as the point of contact to and proactively engaging with the Shropshire Safeguarding Community Partnership arrangements.
- Ensuring children and parents are aware of how and encouraged to raise safeguarding concerns and how they will be responded to.
- Act as a source of support, advice, and expertise to all staff; including ensuring that there is ongoing promotion and awareness of safeguarding and children protection in setting
- Ensuring the effective management and oversight of safeguarding information.
- Maintaining and access Professional development and support.

Key Person

- Help ensure that every child's care is tailored to meet their individual needs, through developing a deep understanding of the child and supporting them in their learning.
- Help the child become familiar with the setting.
- Build a relationship with the parents.
- Build a settled and secure relationship for the child.

All staff (including students and volunteers):

Are expected to adhere to the policies, processes and systems that support safeguarding as outlined in this policy. This specifically includes:

- Accessing and maintaining Professional development and support to ensure they remain knowledgeable and confident in their safeguarding practice.
- Recognise, Respond to and Report any possible safeguarding concerns.
- Adhere to Whistleblowing procedures, this includes raising concerns (however small) about individual behaviour or practices or cultures in settings that compromise the safety of children.
- Educating our children in how to keep themselves and others safe both online and in face-to-face situations.

Professional development and support

To ensure all our staff are knowledgeable and confident in keeping children safe in our setting; they will complete the professional development activities as outlined below. We monitor professional development activities and maintain a central professional development record.

The Designated Safeguarding Lead and Deputy Designated Safeguarding Leads provide all staff with ongoing safeguarding support, advice, and expertise. Staff safeguarding knowledge and competence is overseen as part of the staff induction, supervision, appraisal, and performance processes in setting. The Designated Safeguarding Lead (and deputy(ies)) receive regular support and supervision from *VIP Education every half term.*

Effective supervision provides support, coaching and training for practitioners and promotes the interests of the children. Supervision should provide opportunities for staff to:

- discuss any issues – particularly concerning children's development or well-being, including child protection concerns
- identify solutions to address issues as they arise
- receive coaching to improve their personal effectiveness.

All Staff (including volunteers)

Activity	Frequency

Receive information on setting safeguarding arrangements and procedures as outlined in Early years foundation stage (EYFS) statutory framework - GOV.UK	Induction or when arrangements/procedures are updated.
Read Keeping Children Safe in Education : • **All Staff:** Part 1; Part 5 and Annex B. • **Leadership Team:** Entire document • **Staff who do not work directly with children:** Annex A • **Reading part 3 of EYFS.**	Induction then annually (in Autumn Term) or when updated.
Complete Safeguarding Awareness Training	Induction and then anually
Complete FGM training appropriate to role	Induction and then anually
Complete Prevent Awareness Training appropriate to role *The Prevent duty: safeguarding learners vulnerable to radicalisation - GOV.UK (www.gov.uk)*	Induction and then refreshed annually
Complete Cyber Security Training *Cyber security training for school staff - NCSC.GOV.UK)*	Induction and then anually
Receive regular national and local safeguarding updates (including those relating to online safety)	As required *through EYFS team meetings, bullitins*.

Designated Safeguarding Leads (including any deputies)

Activity (in addition to all staff above) *(see Local Authority Safeguarding in Education Training Statement at: Safeguarding in Education Training/Networks | Shropshire Learning Gateway)*	**Frequency**
Complete Designated Safeguarding Lead Training to a standard as outlined in KCSiE Annex B and EYFS Annex C and in line with local arrangements	On induction in role and then every 3 years
Read EYFS statutory framework for group and school-based providers and Keeping Children Safe in Education in its entirety.	Induction into role then annually (in Autumn Term) or when updated.
Complete Prevent Referral Training: . *and Regional Prevent education co-ordinators - GOV.UK*	On induction and then every year
Complete Brook Traffic Light Training	On Induction and then every 2 years
Complete Operation Encompass Online National Key Adult Training	At least once and before Operation Encompass referrals can be received.
Maintain knowledge and development relating to the role of DSL; including keeping up to date with local arrangements	As required, but at least annually

All LAC/Trustees

Activity	**Frequency**
Complete Committee Members Safeguarding Training.	Induction and then every 2 years.
Read all of EYFS statutory framework for group and school-based providers and • **All Committee member:** Part 1 and 2 and Annex B. Keeping Children Safe in Education • **Committee Chair:** Entire Keeping Children Safe in Education	Induction into role then annually (in Autumn Term) or when updated).
Complete Cyber Security Training *Cyber security training for school staff - NCSC.GOV.UK*	Induction and then annually
Complete Prevent Training appropriate to role*: The Prevent duty: safeguarding learners vulnerable to radicalisation - GOV.UK)*	Induction and every 1 year.

Staff/Committee members involved in recruitment of staff (including administration)

Activity (in addition to other relevant above)	**Frequency**

Read Part 3: EYFS statutory framework for group and school-based providers and part 3 Keeping Children Safe in Education	Induction into role then annually (in Autumn Term) or when updated.
Complete appropriate safer recruitment training	Induction and every 3 years

Ensuring Safe Practice

Safer recruitment

We adopt robust recruitment procedures that deter and prevent people who are unsuitable to work with children from applying for or securing employment or volunteering opportunities in our setting. All staff/committee members involved in recruitment complete additional safer recruitment training. Our recruitment procedures are outlined in *our Safer recruitment policy* and are in alignment with Keeping children safe in education: Part 3 and EYFS Part 3.

We ensure that our commitment to safeguarding and promoting the welfare of children is evident to candidates throughout each stage of the process; with any candidate who is not suitable to work with children being deterred and identified at the earliest point. This policy is included in the application information for candidates. We also ensure that all applicants complete a robust application form. We seek suitable references and carry out online social media checks prior to interview; as well as ensure that there is a focus on the candidate's knowledge and competency in safeguarding practice as part of the interview processes.

We maintain a record of information we have received to confirm the necessary pre-appointment safer recruitment checks are completed on staff (including volunteers, supply staff and students); Committee members who are at our setting. We complete the checks on staff, volunteers, and LAC members who we recruit ourselves. For those who are recruited by others; we ensure that we receive written confirmation of the relevant checks completed and check their identification before they are allowed to work unsupervised or engage in regulated activity with children.

Where we do not have all the necessary information or there are gaps in the information; we have robust risk assessment processes in place to ensure that anyone who does not meet the required standards of pre-appointment checks or suitability does not work unsupervised or engage in regulated activity with children. We do not allow individuals to begin working or volunteering (including acting as a committee member) to work for us until we have received and reviewed their enhanced criminal records check and barred list check and references. We reserve the right to refuse access to the setting site any person who we are not assured is safe to work or engage in regulated activity with children.

On appointment, staff (including volunteers) receive a robust induction programme which provides them with the relevant safeguarding knowledge but also clarity on the expected standards of behaviour within and outside of setting

If any safeguarding concerns or allegations arise relating to a member of staff, committee member or other person working on our setting premises; staff are expected to act in line with Ensuring safe staff and Staff Safeguarding Concerns: Recognise, Respond, Report.

Visitors and contractors

We have a range of visitors to our setting; including professional visitors, children's family members or others attending setting events. All visitors to our setting are expected to act in accordance with our Safeguarding Statement and adhere to our visitor policy. Our staff can use their professional judgment and decides whether any visitor is allowed access to the setting site or needs to be escorted or supervised. We ensure that we have control over who comes into the premises so that no unauthorised person has unsupervised access to children.

We check the identification of visitors and make sure that professional visitors who attend our setting have had the appropriate DBS check or that the visitor's employers have confirmed that their staff have appropriate checks.

When external speakers or visitors attend our setting premises; we conduct due diligence checks to ensure that their views and delivery of material continues to ensure our setting is a safe place. This continues to ensure we are Teaching our children how to keep safe; as well as promoting fundamental British Values and community cohesion.

We will follow our Ensuring safe staff procedures if we become aware of any allegations relating to a professional visitor. When external speakers or visitors attend our school premises (whether for school or non-school activities); we conduct due diligence checks to ensure that their views and delivery of material continues to ensure our school is a safe place. This continues to ensure we are Teaching our children how to keep safe; as well as promoting fundamental British Values and community cohesion (please also see Preventing Radicalisation).

Any contractors without an appropriate DBS will work under the supervision of the Caretaker.

Ensuring safe staff

Staff are expected to act in line with this section when any safeguarding concerns or allegations arise for the following:

- Employed staff
- Supply Staff
- Volunteers
- Committee Members
- Contractors
- Professional Visitors

As further outlined in Roles and Responsibilities the Manager with the oversight of the LAC Chair are responsible for ensuring the safety of the staff and volunteers working for, at or on behalf of our setting; irrespective of whether they are employed by us or another employment agency or business/charity.

Agency staff

We have safeguarding responsibilities when it comes to consider an allegation against an individual not directly employed by us; for example, agency staff. Where this applies, we share safeguarding responsibilities with the employment agency. We will contact the LADO in accordance with Shropshire Safeguarding Community Partnership Managing Allegations Procedures.

Managing allegations (including low level concerns)

We promote an open and transparent culture in which all concerns about the behaviour or conduct of any adults working in, at or on behalf the setting is dealt with appropriately.

There are two levels of allegations / concerns:

1. Allegations that may meet the harm threshold.

Circumstances where a someone working within the setting has or may have:

- behaved in a way that have harmed a child, or may have harmed a child and/or
- possibly committed a criminal offence against or related to a child; or
- behaved towards a child or children in a way that indicates that they would 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. This includes any behaviour that may have occurred outside of the setting that could pose a transferable risk.

Allegations that someone that working in, at or on behalf the setting has met the harm threshold should be immediately referred to the Trust Headteacher or Manager in person. Staff may be required to provide a written statement at the request of the Trust Headteacher or Manager.

If the allegation relates to the Trust Headteacher or Manager (Ladybirds); this should be immediately verbally reported to the Chair of the LAC/Trust

If there is any conflict of interest or immediate risk of harm to a child or; then the person with the concern must ensure Immediate safety and contact the Local Authority Designated Officer in accordance with Shropshire Safeguarding Community Partnership Managing Allegations Procedures. Any allegations that meet the above criteria will be referred to the Local Authority Designated Officer within 1 working day and we will follow their advice and guidance.

In most cases, the Trust Headteacher or manager (Ladybirds) will lead on managing allegations, with the support of the Human Resources Department and the Designated Safeguarding Lead. Re*fer to a Managing Allegations Policy .*

We will notify OFSTED of any allegations of harm or abuse by anyone working or looking after children at the premises. Will do this irrespective of whether the allegations of harm or abuse are alleged to have been committed on the premises or elsewhere, for example, on a visit. We will notify OFSTED as soon as reasonably practical and within 14 days of the allegation first being made, informing them of action taken by completing the online form - Report-a-serious-childcare-incident .

It is essential that any allegations of abuse against a member of staff are dealt with quickly, in a fair and consistent way to effectively safeguard all those involved. We also have a duty of care towards our staff, and we will provide a named contact for the staff member.

If necessary, we will adhere to our legal reporting duties (such as referring to the Disclosure and Barring Service or Teaching Regulation Agency) as employers as outlined in Part 3 Keeping Children Safe in Education if the criteria for such reporting is met.

2. Allegations / concerns that do not meet the harms threshold (Low level concerns).

The term low level does not mean that these concerns are insignificant. A low-level concern is when staff or volunteer may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work. Our staff code of conduct outlines examples of what could be considered a low-level concern.
- Does not meet the harm threshold at point 1 above.

Low level concerns should be reported in person to the Trust Headteacher or Nursery *Manager 9Ladybirds);* to embed our culture of openness and transparency. To ensure that our setting's values and expected behaviours are lived, monitored, and reinforced by all staff.

TheTrust Headteacher or Nursery Manager 9ladybirds) will decide the outcome of all low-level concerns (in consultation with the Designated Safeguarding Lead if necessary). Consideration will be given to whether there is a pattern of behaviour by the individual; or if there is a wider setting culture issue and if policies need to be revised, or if all staff guidance or additional staff training is required.

Whistle Blowing

Whistleblowing is the mechanism by which staff can raise concerns about poor or unsafe practice, wrongdoing and/or potential failures in the setting's arrangements in good faith without fear of repercussions. All staff have a duty to raise concerns about malpractice or wrongdoing where this is impacting on the safety and welfare of children. This may include attitude or actions of colleague's poor or unsafe practice or potential failures in adhering to the settings' policies, procedures and staff code of conduct.

If staff have such concerns; these should be raised to *DSL or Manager refer to whistleblowing policy and procedure for your setting ensuring that procedures include how and when to report concerns and the process that will be followed after a concern is reported.*

If staff feel unable to raise concerns with the setting directly; they can contact

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

Record Keeping and Information Security

We have a legal duty to act in line with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR). We have data protection processes in place to ensure that we keep and process (manage) personal information about children, their families, staff and others safely and lawfully. This includes:

- Securely manage electronically held information in line with Meeting digital and technology standards in schools and colleges *and* *Early Years practitioners: using cyber security to protect your settings - NCSC.GOV.UK* (see also Online Safety)
- Manage requests for access to personal information we hold (known as subject access requests).

Details of our processes and how to request access to personal information we hold are outlined in *Information Commissioners Office Guidance for Organisations* *and/or* *Early Years practitioners: using cyber security to protect your settings - NCSC.GOV.UK)*

Storage and management of safeguarding information (child protection files)

Safeguarding concerns and responses for individual children are kept in a child protection file. Child Protection files are stored individually for each child and are separate to a child's main file.

Child Protection files are stored individually for each child and are separate to a child's main pupil file.

We use CPOMS for electronic storage of information. Green Forms are uploaded to CPOMS and then shredded.

The Designated Safeguarding Lead is responsible for ensuring the quality, maintenance, and management of child protection files; as well as using the recording system to monitor themes and patterns of concern to inform and continue to improve the whole school approach to safeguarding.

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The Designated Safeguarding Lead will ensure that child protection files meet the standards set out in the Shropshire Transition in Education Guidance (safeguarding children at educational transition points) as well as to enable analysis of information held on the child protection file to inform their response.[4]

Sharing safeguarding information with others

Data protection laws and principles allow us to store, share (and withhold) personal information as follows:

- Safeguarding information contained on the child protection file and any other information we hold for safeguarding purposes is 'special category personal data'.
- 'Safeguarding of children and individuals at risk' is a processing condition that allows us to share safeguarding information without consent where there is a good reason to do so; as further explained below.

[4] Assessments: learning from case reviews | NSPCC Learning

- We will not share personal data in circumstances where the 'serious harm test'[5] is met (where sharing would be likely to cause serious harm to the physical or mental health of any individual).

We will seek the advice of our Data Protection Officer and the Information Commissioner's Office when necessary.

We are proactive in sharing information with each other and others who are working with our children and their families as early as possible; so that children can receive the help and support they need; respond to any safeguarding concerns and where possible prevent abuse, neglect, exploitation and /or harm.

Staff are expected to share information with one another as part of their work in setting about the needs and risks of children on a need-to know basis so that we keep children safe and promote their welfare. Staff are not permitted to share information with friends, family, or anyone outside of our setting.

Sharing information with other organisations

Staff should be familiar with and use:

- Information sharing advice for safeguarding practitioners.
- Sharing personal data with law enforcement authorities | ICO
- Statutory guidance on the Information Sharing Duty will be used once is it published by the Government (which is expected in this academic year).

As part of our work in partnership with parents and children; consent to share their information with others outside of setting should always be sought from parent(s) unless it is not safe to do so. This includes where seeking consent would:

- Place the child at increased risk of significant harm.
- Place any other at risk of injury.
- Obstruct or interfere with any potential Police investigation.
- Lead to unjustified delay in making enquiries about significant harm.

If a parent does not consent to information being shared, data protection laws allow us to share information without consent for the purpose of keeping a child safe or if there is another legal basis to do so (such as information sharing requirements in statutory guidance). Where this happens, staff will explain to parents why the information still needs to be shared, unless it is not safe or possible to do so.

Decisions to share safeguarding information with other organisations will be overseen by the Designated Safeguarding Lead.

When deciding what information to share, consideration will be given to:

- the relevancy of the information, including to the current safeguarding risk,
- what is necessary for the receiving organisation to know, and
- whether it is clearly presented and appropriately contextualised.

Professional judgement should be used to ensure that the information shared is focused and proportionate. This may include summarising or omitting information which is not necessary for safeguarding purposes. But care should be taken not to omit information where it may be relevant to understanding or managing safeguarding risk.

Transfer (including receipt) of child protection files and other safeguarding information

When a child leaves for a new education setting; the Designated Safeguarding Lead will arrange for the child protection file (and any additional information to help the new setting to help safeguard and promote the child's welfare) to be transferred to the new setting within 5 working days of an in-term transfer or within 5 days from the start of the new term. They will use the Shropshire Transition in Education Guidance (safeguarding children at educational transition points) to guide their practice approach.

[5] A guide to the data protection exemptions | ICO

We share relevant information with the Local Authority as required by law (please also see Children potentially at greater risk of harm).

Working in Partnership

We will work in in partnership with our children, their parents and other agencies/partnerships as follows:

Children

Our children are taught how to keep safe; including how and when to share or report to us any worries or concerns they may have about their safety and wellbeing or that of others. We encourage children to share, and report worries and concerns by:

- *Having a secure and trusting relationship with their key person*

Parents

We recognise the importance of working together with and supporting parents to safeguard and promote the welfare of their children.[6] This includes:

- Meeting with parents prior to children starting to request information relating to the child's routines, likes and dislikes, special dietary requirements, intolerances/ allergies and allergy action plans and requesting parents inform us of any changes to these throughout the year.
- Communicating to parents how we keep children safe in our setting (including online). If parents want to raise concerns or complaints about how we keep their children safe; they can do this using our Complaints Policy which is available on our website. We also actively seek parent views of safety in setting *explain how and when you do this.*
- The Designated Safeguarding Lead will ensure that we work with parents to offer and enable support for children and their families; taking action to safeguard and promote their welfare (see Designated Safeguarding Lead Response) in line with the local arrangements in the area that they live.
- *Include if this applies to your setting* Carrying out Home Visits in certain circumstances, See home visits policy. Staff will always undertake home visits in pairs
- Ensuring that parents are made aware of how to raise safeguarding concerns or criminal behaviour themselves to the Local Authority and/or Enforcement Agencies. We do this through our website.
- Providing parents with regular information, guidance and external support available to them through the Ovivio parent platform, the EYFS page on our website, Facebook, noticeboards within the Nursery and parent workshops. We strive to develop trusting relationships whereby parents feel able to approach staff to seek advice, support and signposting to support.
- Meeting with parents prior to children starting to request information relating to the child's routines, likes and dislikes, special dietary requirements, intolerances/ allergies and allergy action plans and requesting parents inform us of any changes to these throughout the year

Other agencies/partnerships

Our local safeguarding partnership is the Shropshire Safeguarding Community Partnership (SSCP). We engage and co-operate with these arrangements by:

- Ensuring we effectively safeguard and promote the welfare of children living in Shropshire in line with Working together to safeguard children and the Shropshire Safeguarding Community Partnership local criteria for action and assessment; as outlined in the Framework for Action .
- Where children do not live in Shropshire but attend our setting; we will work in line with the relevant local arrangements in their home area.
- Ensuring we work with other agencies and comply with other pieces of relevant statutory guidance in safeguarding Children potentially at greater risk of harm.
- Supplying information and co-operating in multi-agency forum/meetings, audit or learning reviews as requested by the safeguarding partners.

[6] Outlined in Working Together to Safeguard Children Chapter 1: Principles for working with parents and carers

- Working closely with Shropshire Council Learning and Skills Services and other Shropshire Council Services/partnerships to ensure we are providing high quality education and support to children in Shropshire.
- Participating in the local Operation Encompass arrangements; an arrangement where police notify settings if they have reasonable grounds to believe a child attending the setting may be a victim of domestic abuse. This includes all children connected to a household where the police have attended a domestic abuse incident. This enables us to provide appropriate emotional or practical support to a child/ren who may have been witness to and victim of domestic abuse. All new parents/carers are sent a letter informing them of our participation in Operation Encompass

Sleeping Arrangements and Safer Sleep

We are committed to ensuring that all babies and children are provided with safe sleeping arrangements in accordance with current EYFS requirements and safer sleep guidance. All babies and children are placed down to sleep safely and are supervised appropriately at all times.

All sleep spaces will have a firm, flat surface with a waterproof mattress and lightweight bedding, tucked securely below the child's shoulders to prevent it covering their head, or an appropriately fitted baby sleep bag used in accordance with the manufacturer's instructions.

- Children under two years of age are always placed on their back in their own separate sleep space on a firm, flat surface, such as a cot, bed or floor mattress.
- Babies aged 12 months and under sleep only in a cot. Cots are kept free from pillows, duvets, toys, cot bumpers, wedges, straps or any other unnecessary items.

We take steps to ensure children do not become too hot or too cold whilst sleeping and maintain a comfortable room temperature, generally between 16°C and 20°C for babies.

Babies under six months of age are always supervised by an adult who remains in the same room throughout their sleep period. All sleeping children are checked frequently and remain within sight and hearing at all times.

Our practice is informed by current NHS guidance on reducing the risk of Sudden Infant Death Syndrome (SIDS) and the safer sleep recommendations published by The Lullaby Trust.

Teaching our children how to keep safe.

We recognise that educating our children in how to keep themselves and others safe both online and in face-to-face situation plays a crucial role in safeguarding them. We have a clear set of values and standards that provide opportunities for children to learn how to keep themselves and others safe; that are embedded throughout our setting -

- Safeguarding Statement
- Parental education
- Behaviour
- Preventing Radicalisation
- Our approach to Online Safety
- Our Personal, Social and Emotional development curriculum supports children to understand their own and other's feelings, build positive relationships and learn how to look after their bodies.

The Manager, Room Leader and DSL will work closely with all staff to ensure that this is implemented; and being responsive to any safeguarding themes or patterns of concern that arise in setting.

Online Safety

The use of information and communication technology (ICT); is a vital part of the everyday functioning of and life in setting We also recognise the important role ICT plays in the lives of our children and their families.

Whilst there are many benefits and strengths in using ICT; there are also a number of risks to children's welfare and safety in setting when using internet enabled technology; which are summarised in the following categories[7]:

- **content:** being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories.
- **contact:** being subjected to harmful online interaction with other users or generative AI applications that simulate this; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes**.**
- **conduct:** online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images including those generated using AI and online bullying,
- **commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams.

We adopt a whole setting approach to online safety which aims to safeguard and educate our children and their families, staff, visitors and our setting in our use and management of ICT (including the use of Artificial Intelligence, camera enabled mobile and personal devices and the ICT systems we have in place).

- *Safeguarding children and protecting professionals in early years settings: online safety considerations - GOV.UK*

Our Online Safety Policy outlines our approach as to how technology is used, by who and when including:

- The use of mobile phones, cameras and other electronic devices with imaging and sharing capabilities *(This is in line with Early years foundation stage (EYFS) statutory framework see separate mobile phone and electronic device policy.)*
- Filtering and monitoring systems which are in line with digital and technology standards for Filtering and monitoring and include:
    - Identification and assignment of roles and responsibility to manage filtering and monitoring systems.
    - Reviewing filtering and monitoring provision at least annually
    - Blocking harmful and inappropriate content without unreasonably impacting teaching and learning
    - Ensuring effective monitoring strategies in place that meet our safeguarding needs.
- Reference to our Cyber security arrangements that ensure information security, reduce the risk of disruption and mitigate safeguarding risks These are in line with digital and technology standards for Cyber Security and take account of Schools | National Cyber Security Centre and Early Years practitioners: using cyber security to protect your settings | National Cyber Security Centre. *Image guidance for education settings - UK Safer Internet Centre*

  Any setting cyber security incidents will be reported to Action Fraud (National Fraud and Cyber Crime Reporting Centre) and, if there is a data breach this will be reported to the Information Commissioners Office.

- All Staff, managers, owners and members of the LAC are appropriately trained to enable them to ensure effective online safety arrangements.
- We will respond to online safety incidents which indicate safeguarding concerns in line with this policy.

[7] Examples of what could be included in the categories is further detailed in Keeping Children Safe in Education (Part 2)

Reviewing online safety

We review our online safety arrangements at least annually to ensure that we meet the online safety standards outlined in Keeping children safe in education and Early years foundation stage (EYFS) statutory framework;

We record the outcomes of our reviews including any risks. Risks and actions arising are added to our setting evaluation and improvement action planning processes and reported to and overseen by our Manager/Trust Headteacher.

Preventing Radicalisation

The Prevent Duty for England and Wales (2015) under section 26 of the Counterterrorism and Security Act 2015; places a duty on all registered childcare providers to have due regard to the need to prevent people from being radicalised into terrorism.

We have a Preventing Radicalisation/Terrorism policy in place. *Please refer to The Prevent Duty (Preventing Terrorism) | Shropshire Learning Gateway*

We fulfil our duty by:

- *Promoting fundamental British Values as part of our values and curriculum*
- *See relevant EYFS British Values policy*
- *Ensuring that we provide a "safe space" for children to understand and discuss sensitive topics, those linked to radicalisation and terrorism, and learn (according to their age and level of development) how to question and challenge these ideas in a politically balanced way.*
- *Being alert to and identify children who may be susceptible to radicalisation into terrorism and where it is assessed as appropriate by the Designated Safeguarding Lead; make a Prevent referral (in line with the local Preventing Terrorism Processes)*
- *Monitoring and reporting any hate based behaviour as part of our Behaviour and Child-on-Child Abuse Policies (Hate related incident reporting processes can be found here).*
- *Ensuring that hosting external speakers or visitors that attend our setting premises are suitable and appropriately supervised (please also refer to Visitors)*
- *Assessing the risk of our children being drawn into terrorism, ensuring this is informed by the potential risk in the local area. Any identified risks are referenced in our setting evaluation processes; and inform our approach to online safety (including filtering and monitoring and cyber security arrangements).*

We regularly review our adherence to the Prevent Duty. Any actions arising from our assessment are included in our setting evaluation and improvement action planning processes. These are reported to and overseen by our Manager / DSL /committee.

All Staff are appropriately trained to enable them to ensure that all children, particularly those who may be susceptible to radicalisation are effectively safeguarded. We respond to children who are identified as being susceptible to radicalisation in line with this policy.

Children potentially at greater risk of harm

We recognise that whilst all children should be protected, some groups of children are potentially at risk of greater harm than others (both online and offline). The list below is not exhaustive but highlights some of those groups. Where a child falls into multiple groups above; this potentially further increases their vulnerability.

Children under 5, particularly babies and those not yet born

Children under 5 years of age are particularly vulnerable to abuse and neglect[8]. Babies (under the age of 1 including those not yet born) are more vulnerable to experiencing serious harm in certain circumstances.[9]

[8] Early years safeguarding and child protection | NSPCC Learning

[9] Vulnerable babies | Child Safeguarding Practice Review Panel

As part of our nursery provision, we care for children under 5 including babies under the age of 1 and follow the Early Years Foundations Stage Statutory Framework, we also often work with families who are pregnant or who have children in this group.

We consider the safety and welfare of every child within a family; even if they do not attend our setting. As such, we ensure that we are alert to families who are pregnant and/or have children under the age of 1, including paying attention to any indications that children in this group may be at risk.

Where concerns about children in this group arise; staff are expected to adhere to Staff Safeguarding Concerns: Recognise, Respond, Report. As part of their response, Designated Safeguarding Leads will ensure they refer to specific regional procedures as applicable including:

- Pre-Birth
- Bruising in Babies and Children

Children who need Local Authority social care (Child in Need and Child Protection).

If a child needs Local Authority social care, as a child in need or because of child protection concerns, they are more vulnerable to harm/further harm and may face barriers to attendance, learning, behaviour and mental health.

The Designated Safeguarding Lead will be informed (if they are not already aware/have referred a child) when a child needs Local Authority Social Care. As part of the core group of agencies working/ supporting the family, we will be involved in discussions about the child's safety and best interests, including ensuring that the child's educational outcomes are promoted.

We ensure that appropriate staff members have access to the information they need in relation to a child's looked after legal status, contact and care arrangements to ensure that they are aware of their greater level of vulnerability and ensure their educational outcomes are promoted.

Looked After Children and previously looked after children (including care leavers).

The most common reason for children becoming looked after is because of abuse and/or neglect; as well as/or other significant complexities or adversity in their and their family's life. They are more vulnerable to harm/further harm and may face barriers to attendance, learning, behaviour and mental health.

We ensure that appropriate staff members have access to the information they need in relation to a child's looked after legal status, contact and care arrangements to ensure that they are aware of their greater level of vulnerability and ensure their educational outcomes are promoted. The DSL will work closely with the local authority; including the allocated social worker; as well as the Virtual School to promote the educational achievement of children who are/have been looked after; and where required will respond to safeguarding concerns.

Children whose attendance is low or sporadic

We are aware that non-attendance, poor attendance, inconsistency in attendance or frequent lateness may be a sign or indicator of further concerns or where the family may benefit from getting extra help, and that the early years setting may be a protective factor for the child and/or family. If we are not informed of the absence or a child is absent for a prolonged period of time, or where we have safeguarding or welfare concerns that are ongoing we will ensure that we follow the Early years attendance policy Early Years and Schools Safeguarding Policies and Guidance | Shropshire Learning Gateway (shropshirelg.net).

Safeguarding children with medical conditions

We recognise the importance of ensuring early support for children with medical conditions to ensure that their welfare is promoted and they are effectively safeguarded.

We support children with medical conditions, including allergies and mental health needs through clear setting arrangements that promote their health, safety and inclusion. Relevant information is obtained from parents and carers, recorded accurately, shared with appropriate staff on a need-to-know basis, and

reviewed when needs change. Staff follow agreed procedures and relevant staff complete appropriate training for:

- managing allergies and dietary requirements, including ensuring safer eating,
- maintaining first aid arrangements and responding to medical incidents
- administering medicines (where necessary),

Where appropriate and proportionate individual health care plans and children's education is adapted to ensure we effectively support children with medical conditions.

Where there are concerns that a child's medical needs are not being effectively managed or responded or indicates risk of suffering abuse, neglect and/or harm (whether from parents/carers or other people outside of their family including staff); staff are expected to adhere to this policy and (in the case of staff, our whistleblowing policy). The Designated Safeguarding Lead will work closely with manager, owner to Work in Partnership and in line with the Framework for Action to ensure that the child is effectively safeguarded.

Children requiring Mental Health Support

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect, exploitation and/or harm. Children who have mental health needs may need additional support to avoid their safety and welfare being compromised. **Only** appropriately trained professionals should attempt to make a diagnosis of mental health problem. However, we understand that we have an important role to play in:

- promoting good mental wellbeing and preventing the onset of mental illness; including Teaching our children how to keep safe.
- observing children and identifying early those who may be experiencing mental health problems or being at risk of developing one,
- ensuring early targeted support is provided, and
- liaison with/referral to specialist services where needed.

The Designated Safeguarding Lead will work closely with the Mental Health Lead to promote and if necessary, enable children to access support from local mental health support and services.
We record the outcomes of our reviews including any risks. Risks and actions arising are added to our school evaluation and improvement action planning processes and reported to and overseen by our LAC.

Children with Special Education Needs Disabilities or other health issues.

Children with special educational needs or disabilities (SEND) or certain medical or physical health conditions can face additional safeguarding challenges both online and offline.

Where safeguarding concerns are raised for a child who has SEND, the Designated Safeguarding Lead will work closely with the SENCO/EYFS Inclusion Lead. *SEND code of practice*

The SEND local offer | Shropshire Council.

Young Carers[10]

Young carers are children who have everyday caring responsibilities for a family member. Children and/or their family may not share that they have such caring responsibilities. The care and support a young carer provide for their family is incredibly important; but the additional responsibility these places on a child can also impact on their safety and wellbeing.

It is unlikely that children within our care will be young carers, but they may have older siblings who are. Staff need to be alert to where there are concerns that a child is a young carer who may need extra help

[10] For further information, please see: Young carers | Shropshire Council

and support; staff are expected to follow Staff Safeguarding Concerns: Recognise, Respond, Report. The DSL will consider liaising with the child's school and supporting the family to access extra family help.

Children who are Black, Asian, Mixed Heritage or from other minoritised ethnic communities.

Children who are Black, Asian, Mixed heritage or from other minoritised ethnic communities (including Gypsy Roma and Travelling communities) are more likely to experience racism, bias, stereotyping or cultural misunderstanding. We recognise that additional barriers can exist when recognising and responding to abuse, neglect, exploitation and/or harm for children in these groups.[11]

We will be aware of when bias (conscious or unconscious) may affect how we work with children and their families in this group.

We will also, where appropriate use, and follow hate relating incident reporting processes.

Children who are questioning their gender

Children can sometimes go through a period of questioning their gender, for the majority this will not continue into adulthood, while a small proportion may continue to question their gender and this feeling may intensify into puberty.

We will not initiate any action to make changes or put support in place to facilitate a child presenting as the opposite biological sex (known as "social transition") unless a child's parent or carers have been involved in the decision (except when involving them would increase risk to the child).

Staff are expected to report the following to the Designated Safeguarding Lead:

- a child requests changes or support for social transition **and** their parent or carer is not aware or already involved in the decision.
- a child has confided in a staff member, or it is known that they are questioning their gender **but** have not made a request for changes **and** the staff member has concerns for the child's safety or wellbeing (if there are no safeguarding concerns, there is no reason to report to the DSL)
- a parent of carer requests changes or support for social transition **and** there are concerns for the child's safety or wellbeing.

Children who are questioning their gender can sometimes be targeted by other children. In some cases, a child who is perceived by other children or adults to be engaging or behaving in ways that are less typically associated with their sex can be just as vulnerable.

Child-on-Child Abuse including harassment and violence

We will not tolerate the abuse of children, including where children abuse other children or use words or actions which downplay or could (if not responded to) lead to abuse, as this can lead to a culture of unacceptable behaviour and an unsafe environment for children. In worst case scenarios this can create a culture that normalises abuse, leading to children accepting it as normal and not coming forward to report it. See positive behaviour policy.

We want to ensure that no child from our setting experiences child-on-child abuse. However, we understand the scale of child-on-child abuse and that we cannot just rely on children telling us child-on-child abuse is happening. Staff should be aware that if a child is scared or intimidated by another child this could be child-on-child abuse. Staff are expected to follow our Appendix A: Child-on-Child Abuse Procedures

[11] See Safeguarding children from Black, Asian and minoritised ethnic communities | NSPCC Learning and Black, Asian and Mixed Heritage children | Child Safeguarding Practice Review Panel

The setting monitors patterns of child-on-child incidents including those involving abuse, to ensure that we are aware of and able to minimise and respond to any emerging themes or patterns of behaviours. This helps us to continue to prevent, identify and respond to child-on-child abuse.

Staff Safeguarding Concerns: Recognise, Respond, Report

Recognise

Be alert and curious!

Pay attention to possible **signs or indicators** of abuse/harm to the child, from the child or others either from your own observation or what the child/others tell you:

Appearance

Behaviour

Communication.

Do not just rely on a child telling you (there are lots of reasons why they won't)

Any child in any family could become a victim of abuse, neglect, exploitation and /or harm. Abuse and safeguarding issues are complex; and can often involve a child experiencing multiple issues or types of abuse.

Staff should always maintain the attitude that abuse "could happen here". Staff should be particularly alert to Children potentially at greater risk of harm and vigilant in identifying the signs and indicators which could indicate a concern that a child is being or could be at risk of abuse neglect, exploitation and /or harm.

Signs and indicators of concern may be evident in spaces and places where children spend time (including when online) Keeping Children Safe in Education: Part 1 and Annex B. and SSCP - Contacts and Definitions.They may be present in the child or others around them (including adults or children); in their:

- Appearance
- Behaviour
- Communication

Signs and indicators can be recognised by staff through:

Concerns shared directly by a child: Staff *must not rely* on children telling them they are experiencing abuse, neglect, exploitation and /or harm. Children may not recognise; feel ready; know how to or be able to communicate concerns or worries. Staff must work in partnership and use professional curiosity and skills in developing trusted and supportive relationships in their everyday work with children.

Observations: In person or online (including online behaviour in setting) of a child or someone else (for example a parent, someone working or visiting the setting).

Concerns shared by others: either verbally or in written communications. This could be parents; other children; other staff members or other adults who may be working in or with the setting or individual children.

There will be occasions where there are signs and indicators of concern but not enough evidence to indicate that the child is at risk of or experiencing abuse. These could be present for a variety of reasons as well as abuse (for example other family circumstances; health or learning needs); and may act as an early sign for the need for additional support (in line with the Framework for Action). In such circumstances, staff are still expected to respond in line with this policy.

Respond

Ensure the immediate safety of the child potentially at risk. If there is **immediate danger**; take action as necessary to protect the child, others and yourself (including contacting emergency services on 999 and refer child protection concerns)

Apply other relevant policies/procedures (e.g. behaviour; first aid; attendance, staff code of conduct and/or Appendix B: Child-on-Child Abuse (including harassment and violence) Procedures as applicable).

Seek views/gather relevant information (if safe to do so).

Remember: Listen (don't investigate), reassure (don't promise) and explain you will be reporting the concerns.

Immediate safety

If a child is in **immediate danger**; staff must take individual action as necessary to keep the child, others, and themselves safe. They must:

- Contact emergency services if someone is in immediate danger (999).
- If necessary; refer child protection concerns themselves.
- Work in line with our Behaviour Policy.
- Report any allegations of harm by adults in a position of trust or unsafe practices in setting.

Other relevant policies/processes

All staff should immediately consider how best to support and protect the child and any other children who may be at risk or involved; ensuring they act in their best interests. Where there are concerns of child-on-child abuse; Appendix B: Child-on-Child Abuse Procedures should be referred to.

Injuries

We request parents notify us of any accidents or injuries to their child before attending setting, we will make a written record of the notification along with any injuries the child may have. We use body maps to record information about physical injuries to a child as part of our accident/behaviour/first aid safeguarding concern reporting processes.

Should a child receive any injuries during setting time; staff will follow our accident reporting, reporting and first aid procedures.

Seek views and gather information from the child and others.

Where safeguarding concerns are identified; staff should (where it is safe to do so) always seek the views of and directly from:

- Children (where appropriate and depending on the circumstances and their role with children).
- any other people involved in setting (only on a need-to-inform/know basis for the purposes of gathering information for the purposes of safeguarding.
- Their parents (if necessary and depending on the circumstances and their role).

Any uncertainty about seeking views should be discussed with the Designated Safeguarding Lead.

Seeking views from the child/parents means asking them what they think using open questions (What? How? etc) and if they want any help or support. Staff should listen, reassure, and explain that concerns will

be reported. Staff should avoid making assumptions, judgments or investigating. Please also refer to When concerns are directly shared by a child.

Views should always be sought unless it is not safe to do so. This includes where seeking views would:

- Place the child at increased risk of significant harm.
- Place any other at risk of injury.
- Obstruct or interfere with any potential Police investigation.
- Lead to unjustified delay in making enquiries about significant harm.

If needs for help and support are identified; parents and children should always be asked for their consent to share information with other organisations so that help and support can be provided to them. If consent is not given; staff should follow guidance in the Recording Keeping and Information Security: Sharing safeguarding information with others section.

Any uncertainty about seeking views should be discussed with the Designated Safeguarding Lead. Decisions to share safeguarding concerns with other organisations without consent will be reported to and overseen by the Designated Safeguarding Lead.

If a child is non-verbal or not able to explain their views themselves due to their age, level of development or needs; then staff should pay attention to how the child may be expressing their views and feelings through their behaviour and use communication tools to help the child share their views. We utlise key person relationships and knowledge of the child, Makaton, Lego Therapy

When concerns are directly shared by a child

Children are more likely to share their experiences and feelings with someone they know and feel comfortable talking to.

When children share the details of or feelings about abuse; the process of sharing can sometimes take time. Children may not share in full or give staff (and sometimes not the same staff member) pieces of information over time. When they do share, this may not always be verbally or directly; but the child may share in their Appearance, Behaviour or other forms of communication.

It takes a lot of courage for a child to share that they feel unsafe or are experiencing abuse, neglect, exploitation and/or harm. There are many reasons why children do not share their experiences (for example, uncertainty, shame, experiences of discrimination, fear, denial or a lack of understanding or ability to recognise and explain their experience).

When children are sharing their concerns; staff should:

- **Listen to the child.** Please refer to this NSPCC poster.
- **Remain calm:** the child may stop sharing if they feel the staff member is upset or shocked by what the child is telling them.
- **Explain it can't be a secret.** Staff must explain to the child that what they share must be passed on and to who so that you can help them. Think about when to do this to make sure the child feels safe and can continue to trust you and other staff.
- **Reassure** and offer comfort to the child (physical touch should not be automatically offered as comfort); recognise their feelings and their courage in sharing their experience. Never deny or minimise what the child is telling you or reprimand them if they decide not to share or for not telling you before.
- **Seek the child's views:** use questions or communication tools that help the child to share from their own point of view. Gather information: do not investigate or assume what is happening to the child.
- **Explain** what will happen next. If you don't know everything that is going to be done, tell the child that you will make sure that they are kept informed.
- **Report and record** the conversation immediately as outlined in the Reporting concerns section.

- **Seek support** if you feel distressed. Support is available through the SAS service details are shared electronically with staff and information posters placed in shared spaces

Report

Report in person to the Designated Safeguarding Lead as soon as possible.

Record your concerns, decisions, actions and outcomes on the safeguarding recording system.

If concerned about a member of staff or someone else in the setting; report in line with Ensuring safe staff.

Report to Designated Safeguarding Lead

All safeguarding concerns must be Reported to the Designated Safeguarding Lead as soon as they are recognised and after the initial response to the child and others. Staff are expected to verbally report their concerns to the Designated Safeguarding Lead.

Where concerns involve an allegation of harm or a low-level concern about someone working in or at the setting; staff must follow Ensuring safe staff.

Record concerns

All safeguarding concerns must be recorded by the staff member in writing – If it is deemed to be urgent please complete a Green form and complete your concern and then hand to a member of the safeguarding team. If necessary they will contact FPOC. All other information is to be stored on CPOMS by staff. Teaching and non teaching staff have access to this and can view children in their class. Members of the safeguarding team can see all children in the academy. *Appendix D: Safeguarding Concern Reporting Form*
Where physical injuries to a child form part of the evidence of the concern; staff will record information about the physical injuries observed on a Body Map. *(Body Maps are available as part of the Compass Multi-Agency Referral Form or the Child Protection Body Map in the West midlands Physical Abuse Procedures).*

Each safeguarding concern record should include:

- a clear and comprehensive summary of the concern.
- details of how the concern was followed up and resolved.
- any action taken, decisions reached with an explanation as to why the action/decision was taken and the outcome.

If staff are unsure of the recording requirements staff should seek advice from the Designated Safeguarding Lead.

Designated Safeguarding Lead Response

Safeguarding concerns can be raised by staff as above; but may also be raised to the Designated Safeguarding Lead by:

- Children, parents, or visitors to the setting
- Other agencies
- The setting's ICT filtering and monitoring systems.

The Designated Safeguarding Lead will:

Consider and assess the concern.

Review the information reported; gather any further information as necessary; including conducting a risk and needs assessment if necessary. The Designated Safeguarding Lead will use and refer to legislation, standards and government and local guidance.

Decide on what action to take.

Once the concern has been considered and assessed; the Designated Safeguarding Lead will decide on action(s) to be taken. They may wish to delegate actions to other members of staff, in the best interests of the child. In making decisions; the Designated Safeguarding Lead will work in partnership with the manager; relevant staff/ owner and any other organisations as appropriate.

Actions could include one or more of the below:

- **Manage internally/provide every day advice and support** in alignment with setting policies and processes and the SSCP Framework for Action offering support to the child and their family in a way which addresses the needs/risks identified. This may also include actions to make locations/setting infrastructure (including online) safer; adapt our curriculum to ensure we are Teaching our children how to keep safe.; or Working in Partnership.
- **Offer Extra Help/Community Based Early Help** in line with local Framework for Action; we will consider offering other support or intervention beyond internal management. This could include offering and/or referring a child and/or their family for enhanced or specialist support services to address the needs/risks identified. Any referrals for support will require parental consent and will take account of children's wishes and feelings.
- **Offer and refer to Family Help:** in line with local Framework for Action. Where is identified that a child and their family would benefit from a co-ordinated, multi-agency response and there are clear needs/risks we will offer and refer to Family Help. This could include offering and/or referring a child and/or their family for enhanced or specialist support services to address the needs/risks identified. Any referrals for support will require parental consent and will take account of children's wishes and feelings.
- **Raise Child Protection Concerns** in line with local Framework for Action and (if applicable) reporting requirements set out Keeping children safe in education.
- **Report to the Police.** If there are any concerns that a crime (including online) may have been committed by someone against or involving a child; concerns will be reported to the Police. The law may also require us to report concerns that crimes have been committed by others where children have not been directly involved (for example in the interests of community safety). We will follow our Sharing safeguarding information with other procedures, including using: Sharing personal data with law enforcement authorities | ICO. Where there is possible criminal behaviour by a child (including in circumstances of child-on-child abuse); we will take account of When to call the police: guidance for schools and colleges.
- **Report Hate-related behaviour to the Local Authority.** We will follow hate relating incident reporting processes where any behaviour is perceived by the reporting person or any other person that the incident was motivated by hostility or prejudice (or perceived hostility or prejudice) based on another person's:
    - Sex
    - Race
    - Religion
    - Sexual orientation
    - Disability
    - Transgender identity

  In these circumstances we may also request the support of the Victim Support IamMe! programme to prevent and respond to hate-related behaviour.

Record actions, decisions, and outcomes.

On the child protection file and in line with Record Keeping and Information Security. This will include assessments and discussions (including meeting notes/minutes) of discussions and meetings with staff or others. The Designated Safeguarding Lead will keep detailed, accurate, written records of all concerns, discussions and decisions made including the rationale for those decisions. This should include instances where referrals were or were not made to another agency.

Manage and oversee any ongoing response.

Once the initial actions are taken; the Designated Safeguarding Lead will decide whether there is an ongoing need to actively monitor or manage the safeguarding needs of a child. Where this is decided; they will ensure that the setting works in partnership with the child; parents, and any other agencies involved. This may include taking further actions (as outlined above) where concerns escalate.

The SSCP Escalation/Resolution of Professional Disagreements Policy will be used to challenge, resolve and if necessary, escalate any concerns the setting may have when working with other agencies in safeguarding children.

Appendix A: Child-on-Child Abuse (including harassment and violence) Procedures

We aim to prevent, identify, and respond to child-on-child abuse at the earliest opportunity by:

- Being clear how we expect our children to behave towards one another. Our Behaviour Policy and Positive Behaviour Policy outlines these expectations; Where behaviour also indicates child-on-child abuse; staff will adhere to the processes outlined in this section.
- Ensuring we are Teaching our children how to keep safe.
- Making sure that children who experience or are at risk of experiencing abuse from other children are identified, feel supported and safeguarded from further harm.
- Making sure that children who have caused or are identified as being at risk of being abusive in their behaviour towards other children are identified, supported and safeguarded from engaging in further harmful behaviour.
- Ensuring that our Designated Safeguarding Lead and other relevant staff have completed training in how to assess and respond to child-on-child abuse including Harmful sexual behaviour, sexual harassment and sexual violence.

What is child-on-child abuse (including harassment and violence)?

Child-on-child abuse:

- Is when a child or group of children inflicts harm or fails to act to prevent harm to another child.
- Actions that cause harm can be a single serious incident or a pattern of incidents.
- Harm caused to a child can be physical, emotional and/or psychological; and can include witnessing the ill treatment of others.
- Can happen both inside and outside of the setting; at home or someone else's home; in public spaces and online. In the setting context; we know that child-on-child abuse can take place in spaces and at times of the setting day where children are less likely to be supervised. Outside of setting (including online) this abuse can also continue and have an impact on a child when they are at setting.
- A child may experience one or multiple types of child-on-child abuse at the same time.

Serious violence including; physical assault and harm, threats to cause serious harm or kill or the threat of harm with a weapon

Serious violence is a continuing safeguarding concern. It can often take place in the context of child-on-child conflict or bullying, and it can also be associated with criminal exploitation.

Staff are expected to be alert to behaviour that causes concern outside of setting (including online). This includes any concerns about a child carrying or using a weapon (or expressing intent to do so) towards another child.

The Designated Safeguarding Lead will follow Our response to child-on-child abuse including carrying out a Risk and needs assessment.

Harmful sexual behaviour, sexual harassment and sexual violence

We follow Keeping Children Safe in Education Part 5: child-on-child sexual harassment and sexual violence to recognise and respond to all signs, reports and concerns of harmful sexual behaviour (HSB), child-on-

child sexual harassment and sexual violence. Designated Safeguarding Leads will carry out Brook Traffic Light Training to help them to respond to child-on-child abuse.

(Brook Traffic Light training is the locally recommended training as outlined in Local Authority Safeguarding in Education Training Statement at Safeguarding in Education Training/Networks | Shropshire Learning Gateway. If your Designated Safeguarding Lead (including deputies) have not completed this accredited and locally expected training; outline what training DSL's complete to assess the sexual behaviour of children)

We are aware of and will adhere to the mandatory duty to report child sexual abuse[12], following the publication of statutory guidance which is expected to come into force this academic year.

Staff should not make decisions about children's sexual behaviour on their own. Staff are expected to seek the support, advice and expertise of the Designated Safeguarding Lead on this subject.

Consensual and non-consensual making or sharing of nudes and semi nudes

Taking and sharing nude or semi-nude explicit images, including those generated using AI of those aged under 18 is a criminal offence.[13]

Where staff become aware that a child:

- has or may have shared a nude or semi-nude images, including those generated using AI either of themselves or another child; or
- has or may have had such images, including those generated using AI of themselves shared by another child or children;

they are expected to follow Sharing nudes and semi-nudes: how to respond to an incident and should immediately report their concerns to the Designated Safeguarding Lead if there is any indication of adult involvement. This expectation applies even if the child indicates that they have consented to the images being shared.

When responding to reports of consensual and non-consensual making or sharing of nude or semi-nude images, including those generated using AI, the Designated Safeguarding Lead will consider:

- Sharing nudes and semi-nudes: advice for education settings working with children and young people
- AI Generated Child Sexual Abuse Material Guides for Professionals | Internet Watch Foundation & National Crime Agency

Children who are more vulnerable to child-on-child abuse (including harassment and violence)

Child-on-child abuse is harmful to all children involved.

When children are abused by other children; there is more often than not a misuse of power or privilege by the child(ren) causing harm. This can have a significant impact on the emotional development and mental wellbeing of the child who is being harmed; and lead them to feel isolated, unsafe, and traumatised.

Children who harm others may have additional or complex needs. Harmful behaviour by children can also be a sign or indicator that a child has an unmet need or could indicate that they themselves are at risk of or are experiencing/have experienced abuse or neglect or some other form of adverse experience[14] in their life.

[12] Further information available at: Mandatory reporting of child sexual abuse in England: update on the Crime and Policing Act | NSPCC Learning

[13] See legislation and guidance at: Safeguarding, sexting and sharing nudes | NSPCC Learning

[14] See Understanding trauma and adversity | Resources | YoungMinds for further information.

Evidence[15] indicates that children within the below areas are at increased vulnerability:

- Have special education needs and/or disabilities and/or health issues.
- Have already been and/or are experiencing abuse or some other kind of adversity or trauma. This includes children who are looked after or who have a social worker due to safeguarding concerns.
- Are eligible for free setting meals. Socio economic inequality can increase incidents of bullying.
- Are from Black, Asian, Mixed Heritage and/or other minoritized ethnic communities (including travelling communities and children for whom English is an additional Language). They are less likely to be identified as children who are being harmed and more likely to be over identified as children who are a risk of causing harm. This is known as adultification bias[16].
- Are Lesbian Gay or Bi-Sexual.
- Are questioning their gender.
- Are female. Girls are generally more vulnerable experiencing child-on-child abuse and to Harmful sexual behaviour, sexual harassment and sexual violence and abuse in intimate personal relationships. They can however also abuse (including harass and behave violently towards) other children.
- Are male. Boys are more vulnerable to experiencing bullying; particularly that which is physical in nature (including being forced to carry out initiation or other acts which humiliate or degrade: known as hazing).
  Boys are more likely to be involved in serious violence including towards other children; particularly if:
  - they have already experienced child maltreatment;
  - previously been a victim of or perpetrated serious violence;
  - are Children whose behaviour causes concern,
    Older boys are also more vulnerable to displaying harmful sexual behaviour; particularly if they have already experienced trauma and family difficulties.

Where a child has several differences and would fall into multiple groups above; this further increases their vulnerability.

Features of abusive behaviour[17] can include:

- A pattern of similar behaviour (this can include lower-level problematic behaviours that have occurred over time that have begun to increase in frequency or seriousness)
- A misuse of power over the child who is being harmed. (please also see children who are more vulnerable above).
- Victimisation of the child who is being harmed. This could also include circumstances where the child causing harm is supported or joined by other children.
- Intrusive behaviour: not considering or enabling the child being harmed to freely agree and/or consent to the behaviour.
- An element of control; coercion and/or force.

[15] Evidence sources:

- Keeping children safe in education Part 2, Part 5 and Annex A
- Prevalence of bullying (anti-bullyingalliance.org.uk).
- Safeguarding d/Deaf and disabled children | NSPCC Learning;
- Safeguarding children from Black, Asian and minoritised ethnic communities | NSPCC Learning;
- Safeguarding LGBTQ+ children and young people | NSPCC Learning;
- Spotlight #3: Young people and domestic abuse | Safelives.
- Addressing child-on-child abuse: a resource for schools and colleges (farrer.co.uk)
- Children and young people who display harmful sexual behaviour | CSA Centre

[16] Adultification bias within child protection and safeguarding (justiceinspectorates.gov.uk)

[17] Adapted from Hackett Continuum as described in Understanding sexualised behaviour in children | NSPCC Learning. When drawing on Hackett's continuum, in order to assess the seriousness of other (i.e. non Harmful Sexual Behaviour) alleged behaviour, it should be borne in mind that there are some aspects of Hackett's continuum which may not of course be relevant or appropriate to consider (see Farrer and Co (2022) page 35-36)

- Physical/sexual violence including threats to cause serious harm or kill, or the threat of harm with a weapon (this does not always have to be present; but where it is so would heighten the level of concern).
- Evidence that a child is actively seeking, planning or getting enjoyment or pleasure from causing harm would also heighten concern.

Our response to child-on-child abuse

In most instances, we will use our Behaviour policy to manage the conduct of children towards each other. Staff should also raise such concerns to the Designated Safeguarding Lead, where they feel child-on-child abuse may be happening.

(Note that Preventing and responding to child-on-child abuse | Shropshire Learning Gateway is maintained by the EQS Safeguarding Team with a list of locally available and relevant services)

Children raising child-on-child concerns either for themselves or others will be taken seriously and never be given an impression they are creating a problem.

- **The behaviour of the child(ren) who is/are allegedly causing harm:** It is important to consider the behaviour of children on a continuum; taking account of their age and level of development; as well as any other needs or circumstances that may influence their behaviour (for example a child who is causing harm to other children could be an indication that they have unmet needs; or may be a sign or indicator that they are experiencing abuse, or are experiencing some other adverse experience which is having an impact upon them).

Risk and needs assessment.

All staff will immediately consider how best to support and protect **all children involved** in child-on-child abuse incidents; ensuring they act in their best interests.

We may deem it necessary to complete a formally recorded risk and needs assessment for all children involved in child-on-child abuse incidents.

It will clearly identify and outline the strategies to be put in place to address risks and needs and so safeguard:

- **All children involved including:**
  - The safety and support needs of/risks to child(ren) directly affected by the behaviour
  - The safety and support needs of/risks to and from child(ren) who is/are allegedly causing harm
  - child(ren) attending the setting who have been indirectly affected by or involved in the behaviour or may be at risk of further behaviour
  - other child(ren) who may not be at the setting who may have been affected by or involved in the behaviour or may be at risk of further behaviour (for example siblings or children who attend other education provisions)
- **Any adults who may be at risk.** This might include staff or parents/carers who may be at risk of child to parent/carer abuse from the child who is causing harm. (please refer to local Multi-Agency Policy: Child to Parent Abuse (CPA))
- **The setting,** including considering the wider setting community and any steps that may be needed to improve the safety of the setting. For example, considering the location and time where harm has allegedly taken place, and considering what steps need to be taken to improve safety.

The risk and needs assessment will be completed using relevant evidence-based assessment tools as applicable; taking account of information from all key staff (and relevant involved professionals) working with the children, as well as their parents/carers. It will also include the views and feelings of the children; where this is safe and appropriate to do so.

The risk assessment will be shared will all staff and relevant involved professionals who work with the children; as well as parents and carers. It will respond to any changes in behaviour and will be regularly updated and evaluated to assess impact.

We use a template risk and needs assessment.

Response

The parents/carers of **children who attend the setting and are directly involved** will be notified of and involved in our response. We will only share the details of other children to parents/carers who do not have parental responsibility for them where we have consent to do so or where a decision has been taken to share to enable them to effectively safeguard their child.

If we identify other child at risk/in need who do not attend our setting; we will Work in Partnership as part of our response.

The Designated Safeguarding Lead will respond in accordance with the designated Safeguarding Lead response earlier in this policy. The risk and needs assessment will inform the response taken.

Recording and monitoring

All child-on- child abuse concerns and responses will be recorded and stored on the child protection files of all involved children. Child-on-child incidents that do not indicate abuse or raise safeguarding concerns are recorded in line with our Behaviour Policy on CPOMs.

Appendix B: File Transfer Record and Receipt

You may wish to add your setting logo on to this proforma.

PART 1: To be completed by sending / transferring setting.

NAME OF CHILD:	
DOB:	
NAME OF SETTING SENDING CP FILE:	
ADDRESS OF SETTING SENDING CP FILE:	
METHOD OF DELIVERY:	BY HAND SECURE POST ELECTRONICALLY
DATE FILE SENT:	
NAME OF DSL TRANSFERRING FILE:	
NAME OF PERSON TRANFERRING TO:	
SIGNATURE:	

PART 2: To be completed by receiving setting, school or college.

NAME OF SETTING RECEIVING FILE:	
ADDRESS OF SETTING RECEIVING FILE:	
DATE RECEIVED:	
NAME OF PERSON RECEIVING FILE:	
DATE CONFIRMATION OF RECEIPT SENT:	
SIGNATURE:	

Receiving School: *Please complete Part 2 and return this form to the Designated Safeguarding Lead listed in Part 1 above. You are advised to keep a copy for your own reference.*

Appendix C: Safeguarding Concern Reporting Form

Recording a concern about a child's safety or welfare

Part 1 – For staff use.

Child Name:			
Date of birth:		**Age of child:**	
Name of referrer:		**Role of referrer:**	
Details of concern: *What are you worried about? Who? What (if recording a verbal disclosure by a child use their words)? Where? When (date and time of incident)? Any witnesses?* *What is the child's account/perspective?*	*in the West midlands Physical Abuse Procedures)*		
Reported to:		**Role of person reported to:**	
Signed:			
Date:			

Part 2: For DSL/Deputy DSL to complete.

What actions have been taken by the DSL: *Ensure you also include the reasons for any actions taken or not taken.* *Also note if this concern is a Key/Significant Event in the child's life or you consider there to be a pattern of concerns/cumulative harm emerging (please refer to Storage and management of safeguarding information (child protection files))*

Has the concern / referral been discussed with parent / carer? If yes note discussion ***If not, state reasons why:***
Referral made to: *Record names of individuals/agencies who have given information regarding outcome of any referral (if made).* *If making a safeguarding referral to Compass, follow up with a Compass Multi-Agency Referral Form* ***Explain why the referral was made (rationale):***

Feedback given to referring member of staff:		***By whom:***	**Date:**
Response to / action taken with child/ parent:		***By whom:***	**Date:**

Other notes / information: Any other action required:	*Ensure you also include the reasons for any actions taken or not taken or decisions made.*	
Signature of DSL :		***Date:***