

1.0 Safeguarding Children Policy

Contents of this policy

1.1 Children’s rights and entitlements	Page 2
1.2 Safeguarding children and child protection (Including managing allegations of abuse against a member of staff)	Page 2
1.3 Collection of children (including uncollected children)	Page 6
1.4 Missing child	Page 7
1.5 Use of images and devices able to capture images including mobile phones	Page 8
1.6 Maintaining children’s safety and security on the premises	Page 10
1.7 Supervision of children on outings (including transportation)	Page 12
1.8 Honour Based Abuse (including Female Genital Mutilation and Breast Ironing)	Page 14
1.9 Prevent Duty and Promoting British Values	Page 17
1.10 Child on child abuse	Page 18
1.11 Fabricated or induced illness	Page 19
1.12 Intimate care	Page 20
1.13 Low Level Concerns	Page 22
1.14 Babysitting	Page 25
1.15 Whistleblowing	Page 27

1.16 Modern Slavery	Page 29
Appendices	Page 30
Legal framework for policies	Page 32
Supporting documents and contact information	Page 32

1.1 Children's Rights and Entitlements

1. Statement of intent

Jack and Jill Pre-school promote every child's right to be strong, resilient and listened to. We do this by creating a safe and secure environment that encourages children to develop a positive self-image, a sense of autonomy and independence. We promote equality of opportunity and anti-discriminatory practice to ensure every child is included and supported.

2. Procedures

- Our day-to-day activities are inclusive of children's heritage, ethnicity, colour, spoken language at home, religious beliefs and cultural traditions.
- We encourage children to be self-confident, strong and resilient by developing a sense of independence.
- We encourage children to establish and sustain relationships with their families, peers and other adults.
- We teach children to share and have respect for other children and adults.

1.2 Safeguarding Children and Child Protection

(Including managing allegations of abuse against a member of staff)

1. Statement of intent

Jack and Jill Pre-school work with children, parents/carers and the community to ensure the rights and safety of children are met by creating an environment in which children are safe. We are committed to a child centred approach and to responding promptly and appropriately to all concerns or incidents and to work with statutory agencies in accordance with the procedures that are set down in 'Keeping Children Safe in Education'), 'Working Together to Safeguard Children' and Bristol Keeping Children Partnership Keeping Children Safe Partnership.

2. Procedures

We are committed to building a 'culture of safety' in which children are protected from abuse and harm in all areas of our delivery.

- We have a Designated Safeguarding Lead available at all times. The DSL takes a lead responsibility for all safeguarding and child protection concerns and has completed inter-agency child protection training. Please refer to the DSL job description.
- All staff and parents/carers are made aware of our safeguarding policies.
- The DSL completes an annual safeguarding audit which is submitted to Bristol Keeping Children Partnership.

- We have procedures for recording the details of visitors to the setting.
- We take security steps to ensure that we have control over who comes into the Pre-school so that no unauthorised person has access.
- We provide adequate and appropriate staffing resources to meet the needs of children.
- A minimum of two staff are present at all times during operational hours.
- All applicants for prospective job vacancies are informed of the requirement to carry out enhanced disclosure checks with the Disclosure and Barring Services (DBS) and that they are exempt from the Rehabilitation of Offenders Act 1974.
- We abide by Ofsted requirements in respect of references and enhanced DBS disclosures for staff and volunteers and students, to ensure that no disqualified person or unsuitable person works at the Pre-school or has access to the children.
- At least one member of staff involved in recruitment has attended Safer Recruitment training.
- Volunteers, students and agency staff do not work unsupervised.
- Procedures for having a concern about a child are displayed in each room.
- We record information about staff qualifications, identity checks and vetting processes on our Single Central Record.
- Children are never in a one-to-one situation with an adult without being visible to others.
- Tickling is not permitted as we recognise that it is a form of play that can, despite good intentions be intrusive and intimate. Tickling can be an expression of dominance; it can cause discomfort and the child may not be physically or verbally be able to express their desire for it to stop.

Responding to and recording suspicions of abuse

We are committed to responding promptly and appropriately to all incidents or concerns of abuse that may occur and to work with statutory agencies in accordance with the procedures that are set down in 'What to do if you're worried a child is being abused'.

- We acknowledge that abuse can take different form – physical, emotional, and sexual as well as neglect.
- We understand and recognise the signs and symptoms of fabricated or induced illness.
- When there are concerns that a child may be suffering from abuse, the member of staff records the details of the concern and discusses what to do with the DSL. The information is securely stored in the Child Protection folder.
- When a member of staff observes signs or signals such as significant changes in behaviour, appearance or play; direct or indirect disclosures, deterioration in general well-being; unexplained bruising, marks or signs of possible abuse or neglect or a child makes comments that give cause for concern, the member of staff:
 - listens to the child, offers reassurance;
 - does not question the child;
 - makes a written record on the child protection case notes and informs the DSL.
- These confidential records are signed and dated and kept securely in the Child Protection folder.

Injuries in non-mobile babies

- We classify a non-mobile baby as a baby who cannot crawl, pull to stand or 'cruise' around furniture.
- Due to the significant risk of abusive injury in a non-mobile baby we will refer ALL non-mobile babies with an injury to a Hospital or Community Paediatrician, or Emergency Department (ED) with trained paediatric staff, even if there is a plausible explanation. We will contact the on-call Consultant Community Paediatrician the same day (via BRI switchboard 0117 9230000) to discuss the case rather than send the child immediately to the Emergency Department (ED).

- All parents of new babies registered with the setting are asked to declare any birthmarks, mongolian blue spots, birth trauma marks or skin conditions the baby may have. They will also be asked to complete a 'Body Map' of any marks identifying, location, size and shape.
- If a non-mobile baby arrives at the setting with significant injury or bleeding from the nose, mouth or ears. We will contact the emergency services via 999, record observations of the injury, discuss with the parent or carer and record any explanation given and then contact the on-call consultant paediatrician via BRI switchboard (01179230000) to advise and alert an ambulance has been called and request social care checks.
- If a non-mobile baby arrives at the setting and a staff member, during the course of their work, notices a mark that they have not seen before and does not appear on the 'Body Map' of the child, the staff member will complete a 'Notice to Report to Community Paediatrician' letter. The letter will then be passed to the parents at collection. This may be done by the member of staff, room lead or manager.
- A 'Notice to Report to Community Paediatrician' form requests the parents/carers to get the injury checked by the Community Paediatrician within 24 hours. The setting will then check that this has taken place by contacting First response or the on-call Community Paediatrician.
- If a baby is brought into the setting with an injury, and the family tell us that the child has already been seen by the Community Paediatrician and they do not have any proof of the visit, such as a letter, we will check with first response/social care that the baby was seen.
- We will ensure that all notes are written up promptly and in full and filed securely.
- We will contact Bristol Local Authority through First Response immediately after any non-mobile baby referral.

Making a referral in an emergency

- If we think a child is in immediate danger we will telephone the police on 999.
- In a medical emergency we will telephone for an ambulance on 999 or ask the parent/carers to take the child to hospital.
- We inform the parent/carers as soon as possible of the emergency action taken.
- We contact Bristol Local Authority through First Response immediately after emergency action has been taken.
- If we have concerns about a child who lives in a neighbouring Local Authority we also contact that authority directly.
- We use a dedicated Child Protection Referral Form for providing information to Children's Social Care or other appropriate agencies.
- We notify Ofsted as soon as is reasonable, but always within 14 days if the incident has taken place on the premises.
- Referrals relating to Prevent Duty are processed through the police.

Making a referral when there is a cause for concern

- We follow Department for Education advice on information sharing in relation to safeguarding concerns.
- If we have concerns about a child's welfare, we refer to the Bristol Multi Agency Threshold Guidance to provide early help and targeted specialist support. This is stored in the Safeguarding file.
- A record is maintained of all referrals to First Response and any action taken and the outcome. This is filed securely.
- We follow Bristol Keeping Children Partnership guidance where there are any professional disagreements relating to the safety of children.

Informing and supporting parents/carers and families

- Parents/carers are normally the first point of contact.
- If a suspicion of abuse is recorded, parents/carers are informed at the same time as the report is made, except where the guidance of the Local Safeguarding Children Board does not allow this.
- Where the parent/carer is the likely abuser the investigating officers will inform the parents/carers.
- 'What to do if you're worried a child is being abused' is available to parents/carers at the reception desk.
- We continue to welcome the child and the family whilst investigations are being made in relation to any alleged abuse.
- We follow the Child Protection Plan as set by the child's social care worker in supporting the child and their family.
- Confidential records kept on a child are shared with the child's parents/carers, or those who have parental responsibility for the child, in accordance with our confidentiality policy and only if appropriate under the guidance of the Bristol Keeping Children Safe Partnership.

Allegations against staff/volunteers and students

- All parents/carers are made aware of the Pre-school's complaints procedures which includes allegations of abuse.
- We follow the guidance of the Bristol Keeping Children Partnership when responding to any allegation regarding a member of staff, volunteer or any other person on the premises who has abused a child.
- We record the details of any allegation on a dedicated referral form and immediately (within one working day) make a referral to the Bristol Local Authority Designated Officer (LADO) via the Designated Senior Manager for Early Years (see contact details below).
- We also report any such incident to Ofsted as soon as is reasonable, but always within 14 days.
- We co-operate entirely with any investigation carried out by Children's Social Care in conjunction with the police.
- Where the Directors of the Pre-school and Children's Social Care agree it is appropriate the Managing Director will suspend the member of staff on full pay, or the volunteer, for the duration of the investigation.
- We have a dedicated whistleblowing policy to enable members of staff to raise concerns about practices and procedures (including safeguarding) within the Pre-school and, if necessary, externally.
- We notify Ofsted as soon as is reasonable, but always within 14 days if an allegation of serious harm or abuse has taken place on the premises or relates to a member of staff, student or a volunteer, whether on the premises or elsewhere. We also notify Ofsted of the action taken in respect of the allegations.

Disciplinary action

- Where a member of staff, student or a volunteer is dismissed from the setting (or resigns before they would have been dismissed) because they have; harmed a child, put a child at risk of harm, or been cautioned or convicted of a relevant offence we notify the DBS so that the name may be included on the Protection of Children and Vulnerable Adults Barred List.

Training and awareness

We are committed to promoting awareness of child abuse issues throughout training. We are also committed to empowering young children through the Early Years Curriculum and promoting their right to be strong, resilient and listened to.

- All members of staff receive in-house safeguarding training at least bi-annually to ensure they have up to date knowledge of safeguarding issues.

- Induction of new staff involves safeguarding training and safeguarding quiz.
- Unqualified and Apprentices are required to meet a level of competency which includes knowledge of safeguarding procedures.
- Regular safeguarding training enables staff to identify signs of possible abuse and neglect at the earliest opportunity, and to respond in a timely and appropriate way.
- The DSL receives training in line with recommendations from the KBSP.
- All staff know the procedures for reporting and recording concerns.
- We introduce children to safeguarding awareness through their personal, social and emotional development. Providing children with an understanding of why and how to keep safe.
- We create within the setting a culture of value and respect for individuals, having positive regard for heritage arising from colour, ethnicity language, cultural and social background. We ensure this is carried out in a way that is developmentally appropriate for the children.
- We believe in building trusting and supportive relationships with families, staff and volunteers and students within the Pre-school.
- We make clear to parent/carers our role and responsibilities in relation to child protection.

5. Further guidance:

- Bristol City Council's 'Procedure and Guidance for Independent Day Care Providers' (April 2015)
- Escalation Procedure Resolution of professional disagreements in work relating to the safety of children (Bristol Keeping Children Partnership August 2016)
- Bristol Multi-Agency Thresholds Guidance (Bristol Keeping Children Partnership)
- Working Together to Safeguard Children
- Keeping Children Safe in Education
- Information sharing - Advice for practitioners providing safeguarding services to children, young people, parents and carers
- Guidance for safer working practice for those working with children and young people in education settings
- Bristol Keeping Children Partnership - Multi Agency Guidance for injuries in NON-MOBILE babies
- South West Child Protection Procedures - www.swcpp.org.uk
- NSPCC - www.nspcc.org.uk

1.3 Collection of Children (Including Uncollected Children)

1. Statement of intent

Jack and Jill Pre-school consider the children's safety is paramount and take responsibility for the safe collection of all children. In the event that a child is not collected by an authorised adult at the end of a session we ensure the child is cared for safely.

2. Procedures

Collection

- Children leave the Pre-school only with their parent/carer or adult authorised by the parent/carer.
- All parents/carers are required to supply the Pre-school with a password for use by authorised persons.
- Children will not be released to anyone under the age of 16 years.

Uncollected child

- If a parent/carer is aware they are going to be delayed they are required to notify the Pre-school.
- If a child is not collected two staff members will stay with the child, keeping them occupied and safe and giving them reassurance.
- The child will not leave the premises with anyone other than the parent/carer or authorised person.
- Staff will not leave the premises to look for the parent/carer or authorised person.

- Staff, Managers or Directors will not take the child off the premises under any circumstances.
- After 15 minutes, and if no message has been received, staff will attempt to contact the parent/carer or authorised person.
- If contact has not been made after 30 minutes from the due collection time staff will contact Bristol Local Authority through First Response and follow their instructions.
- If the child lives in a neighbouring Local Authority we also contact that authority directly.

Late collection

- Parents should endeavour to always collect their child at or before the end of the designated session (12.30 for morning session, 16.30 for afternoon or all day sessions and 17.45 for tea)
- Parents should be aware that late collection of children can create significant difficulties for the smooth running of the Pre-school and can have distressing effects on the child. It should be avoided wherever possible.
- We are aware that occasionally parents/carers may get held up due to unforeseen circumstances.
- Parents are advised to contact the Pre-school by telephone as soon as they are aware that they may be late to collect their child, even if they anticipate only being a few minutes late.
- Due to the difficulties late collection causes the Pre-school, parents may be charged a late collection fee. Parents will be given five minutes grace from the arranged collection time. After that a fee of £5 for every five minutes or any part of five minutes will be charged.
- Charges will be applied at the discretion of the company directors based on circumstances and previous history of late collection.
- In the event of a child being collected thirty minutes later than the due collection time a full written report of the incident will be completed and kept securely in the office.

1.4 Missing Child

1. Statement of intent

Jack and Jill Pre-school recognise the potential risk that children may go missing during sessions, both on and off the premises. Every attempt is made to ensure the security of children is maintained at all times.

2. Procedures

Children missing from the premises

- As soon as it is noticed that a child is missing the Key Carer/Practitioner will alert the DSL. They will make a careful check of all the children present to confirm who is missing.
- The DSL will then ensure a check is carried out covering all exit doors, outside areas, rooms, cupboards and possible hiding places. This check will be carried out quickly and calmly without unsettling the remaining children who will be kept together with at least two members of staff.
- If the search is unsuccessful and the child is still missing the DSL will contact the police immediately on 999/112 and the parent/carer of the missing child.
- The search for the child will continue after calling the police.

Children missing on outings

- Staff will take regular headcounts and, if as a result, a child appears to be missing, the Lead practitioner will be informed immediately.
- The group will stay still and remain together (with at least two members of staff). The Lead practitioner will retrace their steps in the immediate vicinity (for no more than five minutes) to look for the child.
- If the child is still missing after five minutes, the Lead will contact the police on 999/112.
- A member of staff will contact the parent/carer of the missing child and inform them of what has happened and the steps that are being taken to find their child.

- The Lead practitioner will continue the search after calling the police.
- In an indoor venue staff will contact the venue's security.
- The Managing Director/DSL is informed and made aware of what action has been taken.

General

- If the incident warrants a police investigation, all staff will co-operate fully. Children's Social Care may be involved if there are child protection concerns.
- In the event of a police investigation the incident will be reported to Ofsted as soon as reasonable, but at the latest within 14 days.
- The Pre-school Managing Director will be informed of the incident within 2 hours; if unavailable the Deputy Pre-school Manager will be informed. The insurance provider will be informed.
- An incident form is completed.
- Staff must not discuss any missing child incident with the press/media without taking advice from the Managing Director.

1.5 Use of Images and Devices able to Capture Images Including Mobile Phones - add to online safety section in Policy 3,

1. Statement of intent

Jack and Jill Pre-school use still and moving images of children (and adults) to; enhance the experience of children in the Pre-school, to allow parents/carers to have a record of their child's experiences, for publicity purposes and to promote staff professional development. All images are treated as confidential. We are aware of our responsibilities under the Human Rights Act, the Data Protection Act, GDPR and where relevant the Freedom of Information Act.

2. Procedures

General

- Andy Hollingdale (Director) is registered with the Information Commission Office (ICO) as Jack and Jill Pre-school's Data Protection Officer (DPO).
- The Managing Director has overall responsibility for ensuring the appropriate safe use and storage of all camera technology and still and moving images (images) within the Pre-school.
- Only Pre-school equipment is used to capture images of children.

Mobile phones/smart watches

- Staff are permitted to use personal mobile phones only in the staff room or office.
- Only Jack and Jill mobile phones are taken on outings.
- Parents and visitors are requested not to use mobile phones on the premises.
- Staff may choose to use a smart watch to monitor their activity levels whilst at work – this must be done with all connectivity settings turned off. No notifications should appear on the watch when staff are working.
- Smart watches with cameras are not permitted to be worn by staff on site.

Use of Pre-school i-Pads

- The Pre-school recognises the positive impact that technology can have on the efficient running of the setting and the enhancement of learning experiences for children.
- Each play room has access to an Apple iPad.
- iPads will be used by parents to sign their child in and out of the setting.

- When parents have access to any Pre-school iPad it will be in password protected 'Guided Access Mode' (no other apps or programmes are available or accessible including other websites or camera).
- Parents should be monitored by staff when accessing iPads.
- Pre-school staff will use iPads to sign in and out of the building.
- Pre-school staff, through the FAMLY app and software, will use the iPads to record relevant events of individual children's day including, nappy changes, meal consumption, accidents and illness.
- Pre-school staff may use Pre-school iPads to capture images of children for use in a child's learning diary or to be shared with their parents via the FAMLY software (if permission has been granted)
- Images of their child may only be sent to parents via the FAMLY app and by no other means (never by email or social media).
- Staff will **NEVER** access personal email accounts, social media accounts or any other personalised web sites via the Pre-school's iPads.
- At times children may use, with very close supervision, the Pre-school iPads to enhance a learning experience.
- Internet provider filters? Who would a practitioner notify if something unpleasant came up? Ask Gordon to tell us what filters are in place and can we have a report on what is being accessed. Safe settings on iPads? Safe search in browser? Steps to control the use.
- Only apps and websites approved by a Pre-school Director may be accessed by the Pre-school iPads.
- Visiting staff (including work experience, supply staff and staff without a Pre-school DBS) should not have access to the Pre-school iPads at any time.

Use of images of children by the Pre-school

- On admission, parents/carers are explicitly asked for their consent in writing, for images of their child:
 - Unnamed images (individual or group) may be displayed in the Pre-school website, press releases, staff professional development and any other marketing material including Jack and Jill social media page.
 - Images (individual or group) may be taken to create personalised posts on Family, displayed in learning diaries or Pre-school.
- A record of consent is kept securely on *Family*.
- Images are retained for no longer than 3 years; or earlier should parent/carer consent be withdrawn or when no longer required. The DPO is responsible for destroying all hard copies (or returning them to the parent/carer) and permanently deleting all electronic copies of images.
- We only use images of children who are suitably dressed.
- Images of children are not taken in the toilets, nappy changing room or sleep rooms.
- All images are vetted for suitability before being developed (by the Managing Director and/or DPO).
- All members of staff ensure that all images are available for scrutiny and are able to justify any images in their possession.
- Staff receive information regarding the safe and appropriate use of images as part of their safeguarding training and responsibilities.
- Staff, volunteers, students and visitors are not permitted to use personal equipment to capture still or moving images.
- Mobile phones can only be used in the Office or Staff Room.
- Photographs are printed on the Pre-school printer.
- Images are not taken of any child against their wishes. Staff ask children's permission before taking a photograph. Careful consideration is taken prior to taking images of children with Special Educational Needs and/or Disabilities.

Use of images of children by parents/carers

- On joining the Pre-school parents are asked to provide individual pictures of their children to be used on pegs and drawers for identification purposes.
- Parents may also be asked to provide pictures of family members for family books and /or learning diaries. Access to these books is restricted to Pre-school staff and the children only
- Parents/carers may take images of their child taking part in Pre-school events, such as sports day and end of term concerts. These images may include other children participating in the same activity.
- Parents/carers are informed that these images are for personal use only and should not be published in any form or posted on social networking sites.
- Parents/carers taking images of children on the premises or on outings are open to scrutiny and consent may be withdrawn at any time.
- Parents/carers may contact the Pre-school to discuss any concerns they may have about the use of images.

Children taking images

- We discuss and agree age appropriate 'acceptable use' rules with children regarding the use of cameras. Children are appropriately supervised.
- Only Pre-school equipment is used by children to capture images. Equipment remains on the premises at all times.
- Staff encourage children to ask permission before taking any images.
- Images taken by children are only used within the Pre-school.

Use of professional photographers

- All professional photographers used by the Pre-school hold an enhanced Disclosure and Barring Service disclosure and are GDPR compliant.

Use of images by the media or charitable organisations

- During Pre-school events other professional photographers (for example the press or charitable organisations) may take photographs of children. In these circumstances parents/carers are asked to give consent for these photographs to be published.
- Only representatives of press or charitable organisations that have been invited to the event are allowed access and their identity is verified.

Use of images of adults

- All staff are asked to provide consent for their photograph, together with their first and last name, to be displayed in the reception area and on their name badge.
- All staff are required to provide consent for their unnamed image to be used within the Pre-school, on our website, social networking sites or for publicity purposes.
- All staff may provide consent for their image together with their first and last name, to be used on our website, social networking sites or for publicity purposes.

4. Further guidance:

- Taking photographs in schools
- Guidance for safer working practice for those working with children and young people in education settings

1.6 Maintaining Children's Safety and Security on the Premises

1. Statement of intent

Jack and Jill Pre-school has the sole use of the premises and maintain the highest possible security to ensure that each child is safely cared for during their time with us.

2. Procedures

Children's personal safety

- We ensure all staff and regular volunteers and students have an enhanced disclosure from the Disclosure and Barring Service.
- Children are supervised by staff at all times.
- Children are not supervised by volunteers, students or agency staff.
- We maintain the following minimum ratios of adults to children:
 - children under two: 1 adult:2 children
 - children aged two: 1 adult: 5 children
 - children aged three and over: 1 adult: 8 children
- Whenever children are on the premises at least two members of staff are present.
- Our risk assessment procedure ensures the personal safety of children whilst on the premises both indoors and outdoors.
- In the event of the 'Sevenside Siren' being heard (warning of a possible incident involving dangerous substances - apart from testing at 3pm on the third day of every month) children and staff will stay indoors, windows and doors will be closed and staff will await official guidance.

Lockdown

- On very rare occasions it may be necessary to seal off the Pre-school so that it is not able to be entered from the outside. This will ensure that pupils, staff and visitors are safe in situations where there is a hazard in the Pre-school grounds or in the close proximity of the grounds. Depending on the severity of the threat the Manager will make the decision to go into *Full Lockdown* or *Partial Lockdown*. In most situations, its likely *Full Lockdown* protocol will be followed in the first instance then changed to *Partial Lockdown* and then the all clear will be given as and when appropriate. Below is a non-exhaustive list of circumstances in which a full lockdown may be implemented:
 - Advice is given by the emergency services that a full lockdown is necessary.
 - A reported incident or civil disturbance in the local community which potentially poses an immediate risk to the Pre-school community – this could include a terrorist attack.
 - An intruder is on the Pre-school site with the potential to pose a risk to pupils, staff and visitors.
 - A warning being received regarding a local risk of air pollution (e.g. smoke plume, gas cloud)
 - A major fire in the vicinity of the school.
 - The close proximity of a dangerous animal roaming loose.
- DURING FULL LOCK DOWN NOBODY IS PERMITTED TO ENTER OR LEAVE THE BUILDING AS THIS MAY PUT THEM IN IMMINENT DANGER.

Security

- Our security system prevents unauthorised access to the premises.
- Notices are displayed advising parents/carers and visitors of the security systems in place.
- Children's attendance is recorded on arrival by the parent/carer on *Famly*. A head count is taken and numbers of children present are recorded on the white boards in each room and by the main entrance/exit. Regular checks are carried out to ensure the above correspond.
- Children's departure times are recorded by the parent/carer on *Famly*. When a child leaves early the white boards are amended accordingly.

- Children leave the Pre-school only with their parent/carer. Parents/carers may authorise other adults (over 16 years of age) to collect their child. Authorised adults are required to give a password provided by the parent/carer.
- When outside areas are used staff ensure children are counted out and in.
- The arrival and departure times of all staff, students and volunteers and students are recorded on *Family*.
- Staff, students and volunteers and students are required to wear an identity badge or uniform when on the premises.

Visitors

- We have a written procedure for the admission of visitors which is displayed in the reception area.
- The arrival and departure times of all visitors are recorded in the 'Visitors Book', including the reason for the visit and, if applicable, the company or organisation they represent.
- All visitors to the Pre-school are required to wear a 'Visitor' identification badge.
- No visitor is allowed unsupervised contact with children.
- Visitors are not allowed access to the children's toilets.
- Visitors are not allowed the use of mobile phones, cameras or any other device capable of capturing still or moving images and/or recording data.
- Prospective parents/carers are allowed to visit the Pre-school by appointment only.
- Official visitors, with an appointment, who are unknown to the Pre-school must provide formal identification.
- In certain circumstances we may telephone an official visitor's company or organisation to confirm their identity.
- Visitors, without an appointment, who are unknown, are refused access to the premises; unless they have a legal right of entry, such as an Ofsted Inspector or police officer in the course of their duty (they are required to provide formal identification).
- Cleaners and maintenance contractors carry out their work when there are no children on the premises whenever possible. All contractors (such as electricians or plumbers) are supervised at all times if they are on the premises when children are present.

Premises

- Children are not allowed to access the staff room, staff toilet, kitchen area, utility room, work room or stationary cupboard.
- Ofsted is informed, within 14 days, of any changes to the premises that may affect the space available to children and any other significant changes that may affect the safety of children.

1.7 Supervision of Children on Outings (Including Transportation)

1. Statement of intent

Jack and Jill Pre-school recognise the importance of outings for children in providing new and enhanced experiences which embrace the EYFS and recognise the need for safety at all times.

2. Procedures

General

- Parents/carers give consent on registration for their children to be taken on outings as part of the activities of the Pre-school.
- Parents/carers are informed about planned outings and given the choice as to whether their child participates.

- Parents/carers are required to give written consent for their children to attend optional Outdoor Learning sessions.
- A written risk assessment, including adult:child ratios, will be conducted in advance, made available to all staff and taken on the outing.
- Written risk assessments take into account any specific activities children are engaged in.
- In the event of severe weather (such as high winds or heavy snowfall) an assessment is made prior to departure to determine whether it is safe to carry on with the planned outing.
- Before going off site, we will inform the children about what to do in the event that they get lost.
- An emergency meeting point will be established and made known to everyone on arrival.
- All children will be counted at the beginning, at regular intervals and at the end of the outing.
- This policy together with 'Administering Medicine' policies will be taken and adhered to in the event of an emergency.
- There is access to mobile phones (a minimum of 2) by the whole group and by individual group leaders.
- Minimum adult:child ratios are adhered to; however, a higher ratio of adults will apply according to the outing risk assessment.
- A qualified first aider will be present.
- An 'outdoor' first aid kit will be taken.
- Drinking water is always taken.
- When applicable child/staff medication will be taken on the outing and be administered and recorded as usual.
- Named children are assigned to individual staff to ensure each child is individually supervised, to ensure no child goes astray, and that there is no unauthorised access to children.
- Essential records are taken including: a register, emergency contact details for staff and children (at least 2 per child), accident and incident forms, address and post code of location and, if applicable, medical records (including children with known allergies).
- Children wear clothing suitable for the weather conditions and the nature of the outing. Children are required to wear built in shoes.
- Spare clothing and plastic bags are taken.
- A record of outings is maintained including: date, time of departure and return, venue, mode of transport, and the names of staff and children.

Transport

- Staff do not use their own vehicles to transport children or parents.
- Regular head counts are taken when children are boarding and getting off transport.
- When using transport at least two staff members will escort children from the Pre-school and then travel in the vehicle with the children.
- No child will ever be left unattended in a vehicle.
- The doors remain unlocked whilst the vehicle is occupied and stationary.
- Doors that are accessible to children are locked while the vehicle is in transit.
- All mini-buses used are fitted with three point safety belts which are used to secure children. If parents/carers wish, an appropriate child restraint (car booster seat) may be used if a named seat is supplied and fitted by the parent/carer. Pre-school staff ensure all children are seated safely and securely.
- Maximum seating will not be exceeded.
- The Outings Lead ensures that the vehicle is parked in a manner that will allow children to embark and disembark safely.
- Children will sit one to a seat and will not be allowed to occupy the front seats in mini-buses, coaches or public transport and will remain seated throughout the journey.
- Adults will seat themselves evenly throughout the mini-bus or coach.

- When using public transport children will be seated with the Pre-school Play Leaders and will not be permitted to sit directly with members of the public at any time.

Emergencies

- First aid will be administered by a qualified first aider whilst the remaining children are supervised and kept calm.
- An ambulance will be called if required.
- The child's parents/carers or emergency contact will be informed, if they are unavailable, a member of staff may accompany the child in the ambulance. Arrangements will be made for the remainder of the group ensuring adult:child ratios are maintained.
- A record of the accident/incident and of any medication administered will be completed and endorsed by the Managing Director.
- In the case of any serious accident, injury or death we inform the Health and Safety Executive (using the RIDDOR format) and notify Ofsted as soon as reasonable, but at the latest within 14 days.

1.8 Honour Based Abuse

Legislation

Cases of honour based violence or abuse will be prosecuted under the specific offence committed e.g. common assault, inflicting Grievous Bodily Harm, stalking and harassment, kidnap, rape, threats to kill and murder.

Background

HBA can be described as a collection of practices which are used to control behaviour within families or other social groups in order to protect perceived cultural and religious beliefs and/or honour. Such abuse occurs when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code.

It is a violation of human rights and may be a form of domestic and/or sexual abuse. There is no, and cannot be, honour or justification for abusing the human rights of others. For young victims it is a form of child abuse.

The term 'honour based abuse and violence' relates to the offender/s interpretation of the motivation for their actions.

Honour based abuse and violence cuts across all cultures and communities. It affects people of all ages, but often begins early in the family home. Girls and women are particularly at risk of honour based abuse, however boys and men are also affected and may be at heightened risk if there are factors around disability, sexuality and mental health.

It can be distinguished from other forms of abuse and violence, as it is often committed with some degree of approval and/or collusion from family and/or community members. Women, men and younger members of the family can all be involved in the abuse. Victims of honour-based abuse are more likely to be abused multiple times by multiple perpetrators.

Female Genital Mutilation – update based on Keeping Child Safe Partnership (Feb 24) / risk assessment.

1. Statement of intent

Female Circumcision, **also known as Female Genital Mutilation or Female Genital Cutting is an illegal practice** in the UK (Female Genital Mutilation Act) and it is an offence to take UK nationals, permanent or habitual UK residents to carry out FGM abroad, or to aid, abet, counsel or procure the carrying out of FGM

abroad, even in countries where the practice commonly practiced. We are aware that FGM has a higher prevalence in Bristol and that it is an offence to fail to protect children. Therefore, through multi-agency working we have a statutory responsibility to safeguard children from being abused through FGM.

2. Definition

FGM refers to procedures of any alteration involving partial or total removal of the external female genital organs/ **narrowing of opening**. The procedure may lead to short term and long-lasting harmful consequences. The United Nations addresses FGM as violation of human rights. In the UK, FGM is a criminal offence and a harmful form of child abuse. It is illegal to practice in the UK and/or anyone involved in taking a girl outside of the UK to have FGM carried out will be punished under the FGM Act 2003 and Serious Crime Act 2015. FGM is not a religious practice. **Although FGM is a deeply embedded cultural practice, we ensure cultural sensitivity does not get in the way of safeguarding our children. When dealing with children and families from an FGM community the term 'cutting' will be used. Please see 'traditional terms' for FGM (separate sheet).**

3. Protective procedures

Our staff know there are a range of potential indicators that a girl may be at risk of FGM. FGM often takes place in the summer holidays, as the recovery period after FGM can be 6 to 9 weeks. Professionals should be mindful of high risk times when children go on long holidays and/or are getting a visit by female elder from their country of origin. Additionally, girls are considered at risk where their mother or sisters have undergone FGM, and girls are talking about a 'special' event or procedure to 'become a woman.'

Some signs that MAY indicate a girl is at risk of FGM include:

- Parents requesting an extended leave from school on top of school holidays
- If a girl comes from a country that has high prevalence of FGM
- Mother and other siblings have already undergone FGM
- Child may indicate that they are going for a special event
- **Child asking for help, aware of what is about to happen**

Post FGM symptoms can include, but are not limited to:

- The child has changed in behaviour after a prolonged absence from the setting
- The child has health problems, particularly bladder or menstrual problems;
- The child has difficulty walking, sitting or standing and may appear to be uncomfortable.
- The child is spending long periods of time in the bathroom/toilet.
- Parents/carers reluctant to explain reasons for absence.
- The child is talking about themselves in the third person or talking about a "friend's" problem.

We understand we have a duty to report to the police if FGM appears to have been carried out on a girl under 18. Immediate reporting is required if FGM has been performed recently, and in historical cases, reporting must take place within one month. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the Designated Safeguarding Lead and involve Children's Social Care as appropriate. **When there is a language barrier, we will not use family members or friends as an interpreter.**

As a setting, we will aim to raise awareness of FGM by:

- Circulating and display materials about FGM.
- Displaying relevant information.
- Informing colleagues/raising awareness of the issues around FGM – as well as including appropriate training in continuing professional development.

4. Further guidance:

- Bristol City Council's 'Child Protection and Safeguarding Procedure and Guidance for Independent Day Care Providers'
- Working together to safeguard children
- Information sharing - Advice for practitioners providing safeguarding services to children, young people, parents and carers
- Guidance for safer working practice for those working with children and young people in education settings
- Inspecting safeguarding in early years, education and skills settings
- South West Child Protection Procedures – www.swcpp.org.uk
- Bristol Against Violence and Abuse (BAVA) email bava@bristol.gov.uk or www.bava.org.uk
- NSPCC – www.nspcc.org.uk
- The Prevent Duty: Departmental advice for schools and childcare providers
- Mandatory Reporting Duty Section 5C of the Female Genital Mutilation Act 2003
- Traditional terms for Female Genital Mutilation

Breast Ironing

Legislation

Although there's no specific law within the UK around breast ironing, it's a form of child abuse. Although breast ironing usually starts when a girl begins to develop breasts (generally between 8 and 12 years of age) we need to be aware of the practice and be aware of concerns raised or noticed in siblings and family members that may be at risk.

If a concern is raised about breast ironing then we will follow our safeguarding procedure.**999**If the child (or adult) is at risk of immediate harm then the police will be called, otherwise the local authority will be contacted and the referral process will be followed.

1.9 Prevent Duty and Promoting British Values

1. Statement of intent

Jack and Jill Pre-school recognises and promotes the British values of democracy, the rule of law, individual liberty and mutual respect for and tolerance of those with different faiths and beliefs and for those without faith. By continually promoting these values we aim to prevent vulnerable children and their families from being drawn into radicalisation and terrorism.

2. Protective Procedures

Staff will be alert to issues including:

- Disclosures by children of their exposure to the extremist actions, views or materials of others outside of the setting, such as in their homes or community groups.
- Graffiti symbols, writing or art work promoting extremist messages or images.
- Parental reports of changes in behaviour, friendship or actions and requests for assistance Use of extremist or 'hate' terms to exclude others or incite violence.
- Intolerance of difference, whether secular or religious or, in line with our equalities policy, views based on, but not exclusive to, gender, disability, homophobia, race, colour or culture.

In order to ensure that we adhere to and achieve the Prevent Duty we will:

- Provide appropriate training for staff. Part of this training will enable staff to identify children who may be at risk of radicalisation.

- We will build the children’s resilience to radicalisation by promoting fundamental British values and enabling them to challenge extremist views (for early years providers the statutory framework for the EYFS sets standards for learning, development and care for children from 0-5, thereby assisting their personal, social and emotional development and understanding of the world).
- We will assess the risk, by means of a formal risk assessment, of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology.
- We will ensure that our staff understand the risks so that they can respond in an appropriate and proportionate way.
- We will be aware of the online risk of radicalisation through the use of social media and the internet.
- As with managing other safeguarding risks, our staff will be alert to changes in children’s behaviour which could indicate that they may be in need of help or protection (children at risk of radicalisation may display different signs or seek to hide their views).
- Our key carer approach means we already know our key children well so we will notice any changes in behaviour, demeanour or personality quickly. Our key carer approach means that we already have a rapport with our families so we will notice any changes in behaviour, demeanour or personality quickly.
- We will assist and advise families who raise concerns with us. It is important to assist and advise families who raise concerns and be able to point them to the right support mechanisms
- We will ensure that all staff will undertake Prevent Awareness training (as a minimum) which includes guidance on how to identify those who may be vulnerable to being drawn into terrorism and how to refer them into the Channel process.
- We will ensure that any resources used in the Pre-school are age appropriate for the children in our care and that our staff have the knowledge and confidence to use the resources effectively.

4. Further guidance:

- Bristol City Council’s ‘Child Protection and Safeguarding Procedure and Guidance for Independent Day Care Providers’ (January 2013)
- Working together to safeguard children (DFE 2015)
- Information sharing - Advice for practitioners providing safeguarding services to children, young people, parents and carers (DFE 2015)
- Guidance for safer working practice for those working with children and young people in education settings (DFE 2015)
- Inspecting safeguarding in early years, education and skills settings (2016).
- South West Child Protection Procedures – www.swcpp.org.uk
- NSPCC – www.nspcc.org.uk
- The Prevent Duty: Departmental advice for schools and childcare providers

1.10 Child on child Abuse

1. Statement of intent

Jack and Jill Pre-school recognises that children are capable of abusing their peers. Child on child abuse can take many forms. Child on child abuse should not be tolerated or minimised as part of growing up and all those involved will be provided with an appropriate level of support. We recognise that the alleged perpetrator is likely to have considerable unmet needs as well as posing a significant risk of harm to other children. This requires a considered and sensitive approach in order that the child can receive appropriate help and support. This policy supports an environment in which children and young people feel safe, secure, valued and respected.

Definition

There is no clear boundary between incidents that should be regarded as abusive and incidents that are more properly dealt with as bullying, sexual experimentation etc. This is a matter of professional judgement. If one child or young person causes harm to another, this should not necessarily be dealt with as abuse: bullying, fighting and harassment between children are not always seen as child protection issues. However, it may be appropriate to regard a young person's behaviour as abusive if:

- There is a large difference in power (for example age, size, ability, development) between the young people concerned; or
- The perpetrator has repeatedly tried to harm one or more other children; or
- There are concerns about the intention of the alleged perpetrator.

If the evidence suggests that there was an intention to cause severe harm to the victim, this should be regarded as abusive whether or not severe harm was actually caused.

2. Protective Procedures

- It is not enough to respond to incidents as they arise: all agencies that work with children should strive to create an environment that actively discourages abuse and challenges the attitudes which underlie it. Therefore, at Jack and Jill we establish an ethos of respect, friendship, courtesy and kindness in all our rooms.
- Any Child on child allegation must be referred to the DSL immediately, using the Jack and Jill Pre-school's child protection procedures. Where a concern regarding Child on child abuse has been disclosed to the DSL(s) advice and guidance will be sought from Early Help.
- The needs of the victim and the needs of the alleged perpetrator will be considered separately;
- We have a Designated Child Protection Officer, the Childcare Director, with Deputy Child Protection Officers in each room.
- All staff and parents/carers are made aware of our safeguarding policies.
- We have a 'Safeguarding Information for Parents and Carers' leaflet, issued to all new parents/carers, copies are available on request and are readily available in the reception area.
- The DSL carries out an annual audit of our safeguarding policies and procedures. An audit is submitted to Bristol Keeping Children Partnership annually.
- We introduce children to safeguarding awareness through their personal, social and emotional development. Providing children with an understanding of why and how to keep safe.

3. Issues

At Jack and Jill Pre-school we are aware that there are particular difficulties that arise in responding to a child or young person who abuses another child because:

- There isn't always a clear dividing line between abusive behaviour and 'normal' childhood behaviour;
- Many adults who abuse children repeatedly established this pattern of behaviour in childhood or adolescence, but a single incident of abuse does not indicate that a young person is likely to abuse again; and
- Some young people who abuse have themselves been abused, but this cannot be assumed in any particular case.

4. Further guidance:

- Bristol City Council's 'Child Protection and Safeguarding Procedure and Guidance for Independent Day Care Providers'
- Working together to safeguard children

- Information sharing - Advice for practitioners providing safeguarding services to children, young people, parents and carers
- Guidance for safer working practice for those working with children and young people in education settings
- Inspecting safeguarding in early years, education and skills settings
- South West Child Protection Procedures – www.swcpp.org.uk
- NSPCC – www.nspcc.org.uk

1.11 Fabricated or Induced Illness

1. Statement of intent

Jack and Jill Pre-school recognises that fabricated or induced illness (FII) or Munchausen's Syndrome by proxy is a rare form of child abuse that occurs when a parent or carer, usually the child's biological mother, exaggerates or deliberately causes symptoms of illness in their child. As a setting we endeavour to recognise the signs and symptoms of this form of abuse and act swiftly and effectively.

2. Protective procedure

Staff will be alert to issues such as:

- Parents exaggerating or lying about their child's symptoms or only the parents noticing the symptoms.
- Symptoms only appear when the parent is present.
- Parents deliberately inducing illness eg by poisoning their child with unnecessary medication or other substances.
- Parents who regularly change their child's GP or visit different hospitals when their view on a child's illness is challenged.
- The child's daily activities are being limited far beyond what you would expect as a result of having a certain condition.

In order to be alert to FII we will:

- Ensure all staff are made aware of the phenomenon.
- Ensure all staff understand when and how to pass on concerns about FII to the DSL.

3. Further Information

www.nhs.uk/conditions/fabricated-or-induced-illness/

1.12 Intimate Care

1. Statement of intent

Jack and Jill Pre-school are committed to ensuring that every child is:

- Safe
- Valued as an individual
- Has the right to personal privacy
- Treated with dignity and respect
- Has the right to be involved and consulted in their own intimate care to the best of their abilities
- Has the right to have levels of intimate care that are as consistent as possible

2. Definition

Intimate care may be defined as any activity required to meet the personal care needs of each individual child.

Intimate care can include:

- Feeding
- Oral care
- Washing
- Changing nappies
- Applying cream
- Dressing/undressing
- Toileting
- Supervision of a child involved in intimate self-care

3. Procedures

These guidelines are designed to safeguard children and staff. They apply to every member of staff involved with the intimate care of children. Disabled children can be especially vulnerable. Staff involved with their intimate care need to be sensitive to their individual needs.

- Only childcare practitioners who have an enhanced CRB or DBS disclosure are to be involved in the intimate care of a child.
- All staff must be trained in the specific types of intimate care that they carry out and adhere to the Intimate Care Policy.
- The child must be involved in their intimate care.
- Try to encourage a child's independence as far as possible in his/her intimate care.
- Where the child is fully dependent talk with them about what is going to be done and give them choice where possible.
- Check your practice by asking the child/parent any likes/dislikes while carrying out intimate care and obtain consent.
- Treat every child with dignity and respect and ensure privacy appropriate to the child's age and situation.
- Only carry out care activities you understand and feel competent and confident to carry out. If in doubt, ASK.
- Promote positive self-esteem and body image.
- Your attitude to a child's intimate care is important. Keeping in mind the child's age, routine care can be relaxed, enjoyable and fun. If you have any concerns you must report them.
- If you observe any unusual markings, discolourations or swelling including the genital area, report immediately to your DSL.
- If during the intimate care of a child you accidentally hurt them, or the child appears to be uncomfortable by your actions, or misunderstands or misinterprets something, reassure the child, ensure their safety and report the incident immediately to your DSL.
- Report and record any emotional or behavioural response by the child.
- The individual child's safety, dignity and privacy are of paramount importance.

It is the responsibility of all staff caring for a child to ensure that they are aware of the child's method and level of communication. e.g. words, signs, symbols, body movements, eye pointing. To ensure effective communication: Make eye contact at the child's level. Use simple language and repeat if necessary. Wait for response. Continue to explain to the child what is happening even if there is no response. Treat the child as an individual with dignity and respect.

Nappy Change Procedure

- Whenever possible a child is to be changed by their key carer.

- The child must be changed in line with the personalised procedure agreed with the child's parent and /or carer.
- The door to the nappy changing area downstairs must be kept ajar by using the door stopper provided. Ensure the 'Nappy Changing in Progress' sign is put on the door downstairs to indicate the room is in use. In The Nest, practitioners will ensure the privacy of the children when changing within the room.
- If using aprons and gloves they should be changed for each child.
- Ensure mats are cleaned with anti-bacterial spray before nappy changing starts and directly after changing each child.
- Ensure that nappy changing is relaxed and a time to promote the child's independence.
- Have a gentle approach and avoid pulling faces and making negative comments about the 'nappy contents'.
- Do not make inappropriate comments about children's genitals when changing their nappies.
- Ensure that the appropriate nappy cream is used for each individual child.
- Ensure nappies and 'pull ups' are disposed of in the designated contaminated waste bin
- After a change, Little Ark and Ark children should be encouraged to wash and dry their hands in the designated children's wash basins, to promote their independence.
- Record the change on the 'Daily Nappy Chart' and *Family*.
- Staff are required to wash their hands before returning to the playrooms or use anti-bacterial gel if they are unable to leave the room.
- Ensure the child is returned to the appropriate childcare practitioner.

Intimate Care Plans for Individual Children

Some children may require an individual intimate care plan. Parents have a responsibility to advise staff of the intimate care needs of their child, and staff have a responsibility to work in partnership with children and parents

- Intimate care arrangements must be agreed by the school, parents/carers and child (if appropriate).
- The manager needs to make provisions for emergencies i.e. a staff member on sick leave. Additional trained staff should be available to undertake specific intimate care tasks.
- Intimate care arrangements should be reviewed at least six monthly. The views of all relevant parties, including the child (if appropriate), should be sought and considered to inform future arrangements.
- If a staff member has concerns about a colleague's intimate care practice, they must report this to the DSL.
- In the situation where a child needs some assistance with intimate care, a permanent member of staff will help but toilet doors should be left ajar.
- Intimate care should be recorded on *Family*.

1.13 Low-Level Concerns

Introduction

A positive culture where concerns can be identified and spoken about openly is a vital component of a strong safeguarding system. All adults who have contact with children in our setting must behave appropriately and behaviour which is not consistent with the standards and values of our setting and which does not meet the expectations set out in our staff code of conduct, needs to be addressed. Such behaviour can exist on a wide spectrum in and outside of work – from the inadvertent or thoughtless, through to that which is ultimately intended to enable abuse. It is crucial that all concerns about adults, including allegations that do not meet the harm threshold

(low level concerns), are shared responsibly and with the right person, and recorded and dealt with appropriately.

Legislation

This policy is in line with Keeping Children Safe in Education (KCSIE). This is guidance for schools but early years and childcare settings must have regard for it.

Aims

- To create a positive and transparent culture where concerns can be discussed openly and where staff are able to share any concerns, no matter how small, about their own or others' behaviour.
- To ensure all staff are aware of their professional boundaries and behave appropriately, in line with the setting's policies, procedures, code of conduct, values and ethos.
- To enable the early identification and prompt and appropriate management of concerns about staff.
- To minimise the risk of abuse.
- To protect staff from false allegations and misunderstandings.

In order to meet these aims, we will ensure that staff are clear about what appropriate behaviour is and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, both in themselves and in others. We will do this through having regular discussions of behaviour at staff meetings and support and supervision sessions.

Terminology – Allegations, Concerns and Harm Threshold

It is important to recognise that, in practice, the words 'allegation' and 'concern' can be and are used interchangeably by different people. Sometimes individuals may shy away from the word 'allegation' and express it as a 'concern' instead. The crucial point is that whatever the language used, the behaviour referred to may, on the one hand, be capable of meeting the harm threshold (and hence be referable), or, on the other, it does not meet the harm threshold (in which case it should be treated as a low-level concern). So, the focus should not be on the language used by the person disclosing it; the focus should, instead, be on the behaviour being described.

Allegations That May Meet the Harm Threshold

The term 'allegation' means that it is alleged that a person who works with children has:

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

Where an allegation meets this harm threshold, it should be dealt with in line with our Staff Allegation Procedure as set out in our Child Protection Policy.

Allegations That Don't Meet the Harm Threshold – Low Level Concerns

Where an allegation doesn't meet the harm threshold, it will be dealt with under this Low-Level Concerns Policy. This does not mean that it is insignificant

Procedure for Dealing with a Low-Level Concern

- Concerns should be shared with the Designated Safeguarding Lead (DSL) or Deputy. This can be done verbally or by providing a written summary. If it is shared verbally, a written record of it will then need to be made (using Low Level Concerns Recording Form). The name and role of the

person raising the concern should be stated, but if they want to remain anonymous, we will respect this as far as possible. However, there may be circumstances where we cannot promise anonymity.

- If it is a low-level concern, the DSL or Deputy will make suitable enquiries. This will include speaking to the person the concern has been raised about and may include talking to any potential witnesses.
- The information gathered from this will then be reviewed to decide whether the behaviour (i) is entirely consistent with our staff code of conduct and the law, (ii) constitutes a low-level concern, (iii) is not serious enough to consider a referral to the LADO – but may merit consulting with and seeking advice from the LADO, and on a no names basis if necessary, (iv) when considered with any other low-level concerns that have previously been raised about the same individual, could now meet the threshold of an allegation and should be referred to the LADO/other relevant external agencies, or (v) in and of itself meets the threshold of an allegation and should be referred to the LADO/other relevant external agencies;
- Where there is any doubt whatsoever, we will seek advice from the LADO - on a no-names basis if necessary.
- Appropriate person, for example the DSL or Line Manager, to take any steps to address the concern/behaviour and to support the person to correct it at an early stage. This will be done sensitively and discreetly and might simply require having a conversation.
- In some circumstances, we may manage the concern under our Disciplinary Policy.
- If the behaviour is determined to be in line with our Staff Code of Conduct and the law, the DSL or Deputy will provide feedback to the person the concern was raised about as to how and why this is.
- All concerns will be recorded in writing, including:
 - Name of individual sharing the concern (unless they want to remain anonymous).
 - Details of the concern.
 - Context in which the concern arose.
 - Conversations with witnesses/others within the setting.
 - Conversations with the LADO/other external agencies (if applicable).
 - Action taken.
- If the concern is about an agency member of staff or contractor, the DSL will also notify their employer so that any potential patterns of inappropriate behaviour can be identified. In the case of a student the college provider will be informed.
- Records will be reviewed regularly so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. For on-going issues, a clear chronology will be kept.
- If the review identifies that there are wider cultural issues within the setting that enabled the behaviour to occur, the DSL and/or Manager will review any relevant policies and procedures and may organise extra CPD.
- If a concerning pattern of behaviour is identified and escalates to meet the harm threshold, then the matter will be referred to the LADO.

If it is determined that the behaviour is entirely consistent with our Staff Code of Conduct and the law, we will review the Staff Code of Conduct and Low-Level Concerns Policy to ensure both are clear.

Self-Reporting

Staff should feel encouraged and confident to self-report anything that could be perceived as a low-level concern about themselves. Any member of staff can self-report to the DSL or Deputy at any time, if:

- They find themselves in a situation which could be misinterpreted, or might appear compromising to others.
- They may have behaved in a manner which, on reflection, they consider falls below the standard set out in the Staff Code of Conduct.

Self-reporting in these circumstances can be positive for a number of reasons: it is self-protective, in that it enables a potentially difficult issue to be addressed at the earliest opportunity; it demonstrates awareness of the expected behavioural standards and self-awareness as to the individual's own actions or how they could be perceived; and, crucially, it is an important means of maintaining a culture where everyone aspires to the highest standards of conduct and behaviour.

Supporting Staff

We recognise we have a specific duty to ensure the health, safety and welfare of all of our staff. With this in mind, the Manager, DSL and Deputy (whoever is involved in dealing with the concern) will be mindful of their duty of care to those involved. All concerns will be dealt with sensitively and discreetly and on a need-to-know basis. Appropriate support will be given to those involved, depending on the nature of the concern.

Concerns Raised by Parents or Carers

We recognise and understand the difference between a cause for concern, a complaint and a staff allegation. When a concern about a member of staff is raised by a parent or carer, this does not automatically mean it meets the threshold for an allegation, even if the parent or carer raises it as a safeguarding concern. When a concern is raised, the Manager and/or DSL will decide which level it is at and will speak with the parent or carer about the rationale behind this.

Record Keeping

- A written record of all low-level concerns will be made, using the setting's Low-Level Concerns Recording Form. This will be used to record details of the concern and the enquiry into it.
- We will retain all records of low-level concerns (including those which are subsequently deemed to relate to behaviour which is entirely consistent with the Staff Code of Conduct) in a central low-level concerns file. Where multiple low-level concerns have been shared regarding the same individual, these will be kept in chronological order as a running record and with a timeline alongside.
- Records will be kept confidential and held securely and will only be accessed by those who need to access them. In most cases this will be the DSL, Deputy DSL, Manager and Registered Person.
- The rationale for storing such records on a central file, rather than in staff members' personnel files, is that (a) it makes it easier to address possible issues (particularly around clarity of Staff Code of Conduct) and review the file and spot any potential patterns of concerning, problematic or inappropriate behaviour; and (b) it reassures staff and encourages them to share low-level concerns.

- Where an issue also triggers our Disciplinary, Grievance or Whistleblowing Procedures that requires records to be made and retained on a staff member's personnel file, this will be done in the normal way, in addition to the records of the low-level concern(s) being retained in a central low-level concerns file.
- The DSL or Deputy DSL will review the central low-level concerns file periodically to ensure that all such concerns are being dealt with promptly and appropriately, and that any potential patterns of concerning, problematic or inappropriate behaviour are identified. A record of these reviews will be made.
- There is no specific retention period for a low-level concerns record. We will therefore keep the record, as with all staff records, for the recommended 6 years after the staff member has left.

References

We have chosen to follow the guidance in KCSIE on providing references, which prohibits unsubstantiated, false or malicious allegations being referred to in a reference. KCSIE states that:

- Where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and found to be substantiated, it should be referred to in a reference
- Low-level concerns (or a group of concerns) which have not met the threshold for referral to the LADO which relate only to safeguarding should not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct, disciplinary action or poor performance.

1.14 Babysitting

1. Statement of intent

Jack and Jill Pre-school do not offer a babysitting service out of our hours. We understand that parents sometimes ask staff members to babysit for their children but advise staff to consider very carefully the implications of entering into a private arrangement with families who attend Jack and Jill.

2. Procedures

- The setting will not be responsible for any private arrangements or agreements that are made between staff and families.
- Out of hours work arrangements must not interfere with a staff member's employment at the setting.
- The staff member(s) concerned must adhere to the our Confidentiality Policy when working privately out of hours.
- Parents should be aware that if other adults accompany the babysitter these adults may not have the relevant Disclosure and Barring Service clearance, and it may not be appropriate for them to be present.
- Jack and Jill Pre-school will not be held responsible for any health and safety or other issues that may arise from these private arrangements.
- Jack and Jill Pre-school has a duty to safeguard all children whilst on the setting's premises and in the care of our staff. If a staff member has concerns about a child following a private babysitting arrangement, they need to pass these concerns on following our safeguarding procedures.

- Payment for babysitting is a private arrangement between the member of staff and the parents. The setting takes no responsibility for any issues around payment.

2. Guidance for Parents/Carers

Jack and Jill Pre-school does not provide a babysitting service.

We have a rigorous recruitment procedure to ensure that we employ competent and professional members of staff who uphold our duty to safeguard children whilst on our premises. Whilst in our employment all staff are subject to ongoing supervision, observation and assessment to ensure that standards of work and behaviour are maintained in accordance with our policies. Due to this, Jack and Jill will not be responsible for any private arrangements or agreements that are made between parents/carers and our staff as we have no control over the conduct of staff outside of their position of employment. Neither will Jack and Jill be held responsible for any health and safety or other issues that may arise from these private arrangements.

Out of hours babysitting must not interfere with staff member's working hours or affect their relationship with the child or other children. Staff are aware that any incident whilst babysitting could have an impact on their suitability to work at the pre-school. Staff do have a duty to report any safeguarding concerns in and outside of work.

Staff are also aware that they are bound by the Confidentiality Agreement and GDPR. They are aware that they are unable to discuss any issues regarding Jack and Jill, other staff members, parents or other children. This includes having regard for the children, other parents/carers and other staff as well as the nursery business itself. Should it be found that any staff member has discussed anything relating to these matters this will result in gross misconduct and the staff member will almost certainly be dismissed. Please be aware that any other adults accompanying the babysitter may not have the relevant DBS clearance and it may not be appropriate for them to care for children.

Babysitting Guidelines for Staff

Jack and Jill pre-school does not take responsibility for any health and safety issues, conduct, grievances or any other claims arising out of your private arrangements outside of nursery hours. You will not be covered by the setting's insurance whilst babysitting as a private arrangement.

You are bound by the Confidentiality Agreement and GDPR that you are unable to discuss any issues regarding the nursery, other staff members, parents or other children. Babysitting must not interfere with your working hours, hinder working relationships or affect your relationship with the child or other children. You have a duty to report any safeguarding concerns in and outside of work.

If you have agreed to babysit for a parent/carer you must notify a Director **via email**. The Director will record the name of the member of staff, the child's name, the parent/carers name and the date they were informed. Following the recording of this initial information, the staff member must inform the nursery manager via email each time they babysit for that parent/carer. These records allow Jack and Jill to have an up to date accurate information should it be required at a future date regarding any safeguarding matters that arise.

Should you still wish to babysit we would strongly advise you to be aware of the following:

- Do you know what you should do if:
 - The child becomes ill
 - The child requires medicine for pre-existing medical conditions
 - Parents do not return or are not contactable
 - There is a fire or other emergency
 - A family member or stranger knocks at the door and wants access to the property or children

- Do you have emergency contact number/next of kin from the parents as well as mobile phone numbers, and contact details for the venue they will be at?

If No, then find out.

You should also be aware that an incident while babysitting could impact on your employment

1.15 Whistleblowing

Statement of intent

Jack and Jill Pre-school are committed to the highest possible standards of conduct, openness, honesty and accountability. We enable members of staff to raise concerns about practices and procedures within the Pre-school and, if necessary, externally. Members of staff can report concerns in a way that is not seen as disloyal to the Pre-school or colleagues.

Procedures

Responsibilities

- All members of staff, including agency staff, students and volunteers, are made aware of their individual responsibilities to identify any inappropriate behaviour displayed by a member of staff, manager or member of the Board of Directors.
- Parents and/or carers and visitors are also able to report concerns they may have in line with this policy.
- All members of staff are aware that they have a legal duty to report any safeguarding or child protection concerns about anyone who has contact with children.
- Possible concerns may include the following:
 - conduct which a member of staff may consider to be a criminal offence;
 - disclosure relating to miscarriages of justice;
 - health and safety risks, including risks to the public as well as other members of staff;
 - possible fraud or corruption;
 - breaches of procedures;
 - environmental risks;
 - failure to comply with legal obligations;
 - sexual, physical or verbal abuse of children or adults;
 - any other behaviour which a member of staff genuinely finds unacceptable or inappropriate;
 - the deliberate concealing of information relating to any of the above matters.

Reporting general concerns

- Staff should follow the procedure set out in Managing Allegations and Low Level Concerns. When a member of staff has a concern they are encouraged, in the first instance, to bring this to the attention of the DSL
- Where a concern relates to the Managing Director or another Director, staff are aware of their responsibility to bring the matter, in the first instance, directly to the attention of another Director or Directors.
- Members of staff raising a concern will not be subjected to any reprisals, harassment or victimisation by other members of staff, management or the Board of Directors.
- Anonymous concerns will be considered, however, the Pre-school and/or any other authority involved will take into account the following:
 - the seriousness of the issues raised;

- the credibility of the allegation;
- the likelihood of confirming the concerns from attributable sources;
- When a member of staff is unsure about how to raise their concerns they may, in confidence, discuss the matter with the DSL, LADO or call the NSPCC Whistleblowing line.
- When a member of staff has raised concerns within the Pre-school, but consider they are not being properly addressed, they may discuss the matter, in confidence, with another relevant authority such as the LADO, police, Health and Safety Executive or Ofsted.
- Members of staff report any concerns as soon as practicable and explain what is concerning them and why.
- Members of staff are not expected to have proof but they are required to demonstrate sufficient grounds for the concerns.
- Disciplinary action may be considered for a member of staff who raises a false or malicious allegation.
- We offer support to the member of staff (whistleblower) during any investigation of the concern.
- We follow the same procedure as Allegations against staff/volunteers (see Safeguarding children and child protection).
- We follow procedures set out 'What to do if you're worried a child is being abused'.

Further guidance

- Working Together to Safeguard Children
- What to do if you're worried a child is being abused
- Keeping Children Safe in Education
- <https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/what-if-suspect-abuse/>

1.16 Modern Slavery

Legislation

The Modern Slavery Act 2015. The act consolidates slavery and trafficking offenses and introduces tougher penalties and sentencing rules.

Background

Child trafficking and modern slavery is becoming a more frequent form of child abuse. Children are recruited, moved, transported and then exploited, forced to work or are sold on. Modern slavery is a term that covers slavery, servitude and forced or compulsory labour as well as human trafficking

Victims of modern slavery are also likely to be subjected to other types of abuse such as physical, sexual and emotional abuse. This policy should be used alongside the following policies to ensure all children, staff, parents and visitors are fully safeguarded:

- Safeguarding and child protection
- Whistleblowing
- Equality and inclusion

For an adult or child to have been a victim of human trafficking there must have been:

- Action (e.g. recruitment, transportation, transfer, harbouring or receipt of a child for the purpose of exploitation)

- Means (threat or use of force, coercion, abduction, abuse of power or vulnerability) There does not need to be “means” for children as they are not able to give informed consent
- Purpose (e.g. sexual exploitation, forced labour or domestic servitude, slavery, financial exploitation, illegal adoption, removal of organs).

Procedure:

When a concern is raised about slavery or trafficking then we will follow our safeguarding procedure Safeguarding Children and Child Protection. If the child (or adult) is at risk of immediate harm then the police will be called, otherwise the local authority will be contacted and the referral process will be followed as per the safeguarding procedure.

Appendix A: Level of Risk Table

These examples are not exhaustive, nor will the examples set out below be appropriate in every context.

LADO referral	Low level concern/LADO Guidance	Appropriate Conduct
<p>An allegation made which meets the threshold for referral to the LADO and appears in the first instance to meet the threshold for referral to police. Allegations that may meet the harms threshold relate to:</p> <ul style="list-style-type: none"> • behaved in a way that has harmed a child, or may have harmed a child and/or; • possibly committed a criminal offence against or related to a child and/or; • behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or • behaved or may have behaved in a way that indicates they may not be suitable to work with children. 	<p>Behaviour/concerns that do not meet the setting’s code of conduct but may not meet the allegation thresholds. Refer to setting’s low level concern policy and procedure.</p> <p>There may have been a series or patterns of low-level concerns which cumulatively meet the threshold of an allegation, and result in a referral to LADO.</p> <p>If the designated safeguarding lead is unclear whether the incident meets the threshold of harm/risk of harm, they may need to seek guidance from the LADO before deciding if the concern or allegation meets the threshold of harm.</p>	<p>Behaviour which is consistent and in line with the setting’s code of conduct and law.</p>
<p>Taking and sharing images of children in a state of undress, sexual Abuse.</p>	<p>Trying to help a child with intimate or personal care tasks which the child can undertake independently.</p>	<p>Using physical intervention to stop a child from running into the road during an outing.</p>
<p>Physically harming a child with intent, with or without leaving a mark. Force feeding, physical restraining or using force as a form of punishment, verbally bullying or humiliating, deliberately leaving children in soiled clothing.</p>	<p>Threatening to use corporal punishment.</p>	<p>A qualified first aider causes an injury when carrying out CPR on a casualty in cardiac arrest.</p>
	<p>Indulges in fun fights, tickling, or ‘rough play’ with children.</p>	
	<p>Use insensitive or unprofessional language or using inappropriate gestures around children including inappropriate nicknames which may demean, humiliate, or might be interpreted as such.</p>	
<p>Social care involvement with own children. Conviction or caution such as a conviction for assault.</p>	<p>Bringing the setting into disrepute, for example through the inappropriate use of social media.</p>	<p>Shouts at children if warning in an emergency/safety situation.</p>
	<p>Undermining the fundamental British values/expressing prejudicial views.</p>	
<p>Persistent noncompliance with setting policies (babysitting, changing, behaviour, lone working, touch, mobile phone, social media), persistent blurring of work life boundaries, domestic abuse, using illegal substances.</p>	<p>Social contact or communication with children or parents and carers outside of the setting without agreement with the setting’s manager.</p>	<p>Comforts a child who is hurt or distressed in line with setting’s positive handling/code of conduct.</p>
	<p>Discussing personal, sexual relationships in the presence of children.</p>	
	<p>Showing favouritism to a child or behave in a manner which is either favourable or unfavourable to children.</p>	
	<p>Handling of children that is inconsistent with the setting’s positive handling policy such as gripping a child’s hand too tightly if holding hands.</p>	

Appendix B: Record Keeping Form for Low Level Concern

Please use this form to record any concern (no matter how small) when an adult may have acted in a way which is not consistent with Jack and Jill's code of conduct (including relating to their conduct outside of work) if the concern does not meet the threshold of an allegation.

This record will be held securely in the office.

Date and time of record:	
Reporting <i>(If the person who raises the low-level concern does not wish to be named, the DSL/manager will respect that person's wishes where possible. Anonymity can never be promised when adults share low level concerns. Where possible adults are encouraged to consent to being named to create a culture of openness and transparency. If the adult is self-reporting, then they should put their own name and role here).</i>	
Full Name of the adult reporting the concern:	
Role:	
Details of the adult involved <i>(who the concern is about)</i>	
Full Name:	
Role:	
Section 1. Details of the alleged incident/concern	
Date and time of incident:	Location of incident:
Details of the incident/concern: <i>(Provide an accurate and precise account of the concern/incident in chronological order and include the context in which the low-level concern arose, who is involved and what has happened. Include details of any witnesses including witness statements, and a statement from the adult involved, include any other relevant or contextual information and precipitating factors that may be appropriate to factor in. Where the low-level concern is provided verbally then this form can be used to record the verbal conversation).</i>	
Signed by:	
Section 2: To be completed by the Manager/DSL	
Conclusion of incident/concern: <i>(Including rationale on why this concern does not meet the threshold of an allegation)</i>	
Action taken: <i>(This may include training, support and supervision, or the setting's disciplinary procedure being used to address conduct or it may include strengthening the setting's own safeguarding policies and procedures).</i>	
Review of actions taken: <i>(Where multiple low-level concerns have been shared regarding the same individual, these will be kept in chronological order as a running record).</i>	
Name of Manager/DSL:	Signature:

Legal Framework

The Children Act 1989
Every Child Matters 2003
Human Rights Act 1998
United Nations Convention on the Rights of the Child (UNCRC)
Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) 2013
Protection of Children Act 1999
Data Protection Act 2018
Safeguarding Vulnerable Groups Act 2006
Protection of Freedoms Act 2012
Sexual Offences Act 2003
Criminal Justice and Court Services Act 2000
Rehabilitation of Offenders Act 1974
Race Relations Act 1976
Equality Act 2010
Counter Terrorism and Security Act 2015
GDPR

Please see Policies and Procedures Relating to:

Valuing diversity and promoting equality
Administering Medicines
Risk assessment
All weather outdoor activities
Confidentiality and client access to records
Information sharing
Employment and staffing
Whistleblowing
Staff working arrangements
Home visit procedure
Recording and reporting of accidents and incidents
Children's records
Provider records
Lockdown procedure
Risk Assessment: Radicalisation of Vulnerable Children
DSL job description

Contact Details:

In an emergency (Fire/Ambulance/Police) call: 999/112

All children:

Families in Focus 0117 352 1499

First Response 0117 903 6444

Outside office hours - Emergency Duty Team - 01454 615165

Referrals relating to children who live in South Gloucestershire:

Information Service - 01454 866000

Referrals relating to children who live in BANES:

Children and Families Assessment and Intervention Team - **01225 396312 or 01225 396313**
Outside of office hours - Emergency Duty Team - **01454 615165**

Referrals relating to children who live in North Somerset:

Single Point of Access - **01275 888808**

Outside office hours - Emergency Duty Team - **01454 615 165**

Referrals of injuries in non-mobile Babies

On-call Consultant Community Paediatrician via BRI switchboard **0117 9230000**

Referrals relating to adults:

Bristol Local Authority Designated Officer (LADO)

Designated Senior Manager Early Years

Tel: 0117 903 7795 / Mob: 07795 091020

nicola.laird@bristol.gov.uk

DBS (Referrals) Telephone - 01325 953 795

PO Box 181

Darlington

DL1 9FA

www.gov.uk/government/publications/dbs-referrals-form-and-guidance

Ofsted:

www.ofsted.gov.uk

Tel: 0300 123 1231

Email: enquiries@ofsted.gov.uk

Post: Ofsted

Piccadilly Gate

Store Street

Manchester

M1 2WD

Channel Process (Radicalisation) channelsw@avonandsomersetpolice.pnn.police.uk

RIDDOR: 0845 300 9923 <http://www.hse.gov.uk/riddor/report.htm>

This revised policy was adopted by the Board of

Directors on:

9th January 2023

Signed on behalf of the Pre-school by:

.....

Mrs Claire Hollingdale (Managing Director)

Date: 9th January 2023