



Safeguarding children and Child Protection

Policy statement

Cricklade Pre-School Playgroup will work with children, parents and the community to ensure the rights and safety of children. Our Safeguarding Policy is based on the three key commitments of the Early Years Alliance Safeguarding Children Policy.

Procedures

We carry out the following procedures to ensure we meet the three key commitments of the Alliance Safeguarding Children Policy, which incorporates responding to child protection concerns.

Key commitment 1

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

- Group provision: Our designated person (a member of the management team) who co-ordinates child protection issues is: **Ann Uzzell**
- When the setting is open but the designated person is not on site, a suitably trained deputy is available at all times for staff to discuss safeguarding concerns.
- Our designated officer (a member of the management team) who oversees this work is:
Kerri Clear

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- The designated person, the suitably trained deputy and the designated officer ensure they have relevant links with statutory and voluntary organisations with regard to safeguarding.
 - The designated person (and the person who deputises for them) understands Local Safeguarding Partners (LSPs) safeguarding procedures, attends relevant LSPs training at least every two years and refreshes their knowledge of safeguarding at least annually.
 - We ensure all staff are trained to understand our safeguarding policies and procedures and that parents are made aware of them too.
 - All staff understand that safeguarding is their responsibility.
 - All staff have an up-to-date knowledge of safeguarding issues, are alert to potential indicators and signs of abuse and neglect and understand their professional duty to ensure safeguarding and child protection

concerns are reported to the local authority children's social care team or the NSPCC. They receive updates on safeguarding at least annually.

- All staff are confident to ask questions in relation to any safeguarding concerns and know not to just take things at face value but can be respectfully sceptical.
- All staff understand the principles of early help (as defined in *Working Together to Safeguard Children*, 2023) and are able to identify those children and families who may be in need of early help and enable them to access it.
- All staff understand their responsibilities under the General Data Protection Regulation and the circumstances under which they may share information about you and your child with other agencies.
- We will support families to receive appropriate early help by sharing information with other agencies in accordance with statutory requirement and legislation.
- We will share information lawfully with safeguarding partners and other agencies where there are safeguarding concerns.
- We will be transparent about how we lawfully process data.
- All staff understand how to escalate their concerns in the event that they feel either the local authority and/or their own organisation has not acted adequately to safeguard and know how to follow local safeguarding procedures to resolve professional disputes between staff and organisations.
- All staff understand what the organisation expects of them in terms of their required behaviour and conduct, and follow our policies and procedures on positive behaviour, online safety (including use of cameras and mobile phones), whistleblowing and dignity at work.
- Children have a key person to build a relationship with, and are supported to articulate any worries, concerns or complaints that they may have in an age appropriate way.
- All staff understand our policy on promoting positive behaviour and follow it in relation to children showing aggression towards other children.
- Adequate and appropriate staffing resources are provided to meet the needs of children.
- Applicants for posts within the setting are clearly informed that the positions are exempt from the Rehabilitation of Offenders Act 1974.
- Enhanced criminal records and barred lists checks and other suitability checks are carried out for staff and volunteers prior to their post being confirmed, to ensure that no disqualified person or unsuitable person works at the setting or has access to the children.
- Where applications are rejected based on information disclosed, applicants have the right to know and to challenge incorrect information.
- Volunteers must:
 - be aged 17 or over;
 - be considered competent and responsible;
 - receive a robust induction and regular supervisory meetings;
 - be familiar with all the settings policies and procedures;
 - be fully checked for suitability if they are to have unsupervised access to the children at any time.

- Information is recorded about staff qualifications, and the identity checks and vetting processes that have been completed including:
 - the criminal records disclosure reference number;
 - certificate of good conduct or equivalent where a UK DBS check is not appropriate;
 - the date the disclosure was obtained; and
 - details of who obtained it.
- All staff and volunteers are informed that they are expected to disclose any convictions, cautions, court orders or reprimands and warnings which may affect their suitability to work with children (whether received before or during their employment with us).
- Staff receive regular supervision, which includes discussion of any safeguarding issues, and their performance and learning needs are reviewed regularly.
- In addition to induction and supervision, staff are provided with clear expectations in relation to their behaviour.
- We notify the Disclosure and Barring Service of any person who is dismissed from our employment, or resigns in circumstances that would otherwise have led to dismissal for reasons of a child protection concern.
- Procedures are in place to record the details of visitors to the setting.
- Security steps are taken to ensure that we have control over who comes into the setting so that no unauthorised person has unsupervised access to the children.
- Steps are taken to ensure children are not photographed or filmed on video for any other purpose than to record their development or their participation in events organised by us. Parents sign a consent form and have access to records holding visual images of their child. Staff do not use personal cameras or filming equipment to record images.
- Personal mobile phones are not used where children are present.
- The designated person in the setting has responsibility for ensuring that there is an adequate online safety policy in place.
- We keep a written record of all complaints and concerns including details of how they were responded to.
- We ensure that robust risk assessments are completed, that they are seen and signed by all relevant staff and that they are regularly reviewed and updated, in line with our health and safety policy.
- The designated officer will support the designated person to undertake their role adequately and offer advice, guidance, supervision and support.
- The designated person will inform the designated officer at the first opportunity of every significant safeguarding concern; however, this should not delay any referrals being made to children's social care, or where appropriate, the **LADO**, Ofsted or RIDDOR.

Key commitment 2

We are committed to responding promptly and appropriately to all incidents, allegations 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' (HMG, 2015) and the Care Act 2014.

Responding to suspicions of abuse

- We acknowledge that abuse of children can take different forms - physical, emotional, and sexual, as well as neglect and witchcraft.
- We ensure that all staff have an understanding of the additional vulnerabilities that arise from special educational needs and/or disabilities, plus inequalities of race, gender, language, religion, sexual orientation or culture, and that these receive full consideration in relation to child, young person or vulnerable adult protection.
- When children are suffering from physical, sexual or emotional abuse, or experiencing neglect, this may be demonstrated through:
 - significant changes in their behaviour;
 - deterioration in their general well-being;
 - their comments which may give cause for concern, or the things they say (direct or indirect disclosure);
 - changes in their appearance, their behaviour, or their play;
 - unexplained bruising, marks or signs of possible abuse or neglect; and
 - any reason to suspect neglect or abuse outside the setting.
- We understand that we should refer any child who may be at risk of significant harm to local authority children's social work services.
- We are aware of the 'hidden harm' agenda concerning parents with drug and alcohol problems and consider other factors affecting parental capacity and risk, such as social exclusion, domestic violence, radicalisation, mental or physical illness and parent's learning disability.
- We are aware that children's vulnerability is potentially increased when they are privately fostered and when we know that a child is being cared for under a private fostering arrangement, we inform our local authority children's social care team.
- We are prepared to take action if we have concerns about the welfare of a child who fails to arrive at a session when expected. The designated person will take immediate action to contact the child's parent to seek an explanation for the child's absence and be assured that the child is safe and well. If no contact is made with the child's parents and the designated person has reason to believe that the child is at risk of significant harm, the relevant professionals are contacted immediately and LSPs procedures are followed. If the child has current involvement with social care the social worker is notified on the day of the unexplained absence.
- We are aware of other factors that affect children's vulnerability that may affect, or may have affected, children and young people using our provision, such as abuse of children who have special educational needs and/or disabilities; fabricated or induced illness; child abuse linked to beliefs in spirit possession;

sexual exploitation of children, including through internet abuse; Female Genital Mutilation and radicalisation or extremism.

- In relation to radicalisation and extremism, we follow the Prevent Duty guidance for England and Wales published by the Home Office and LSPs procedures on responding to radicalisation.
- The designated person completes online Channel training, online Prevent training and attends local WRAP training where available to ensure they are familiar with the local protocol and procedures for responding to concerns about radicalisation.
- We are aware of the mandatory duty that applies to teachers, and health workers to report cases of Female Genital Mutilation to the police. We are also aware that early years practitioners should follow local authority published safeguarding procedures to respond to FGM and other safeguarding issues, which involves contacting police if a crime of FGM has been or may be about to be committed.
- We also make ourselves aware that some children and young people are affected by gang activity, by complex, multiple or organised abuse, through forced marriage or honour based violence or may be victims of child trafficking. While this may be less likely to affect young children in our care, we may become aware of any of these factors affecting older children and young people who we may come into contact with.
- If we become concerned that a child may be a victim of modern slavery or human trafficking, we will refer to the National Referral Mechanism, as soon as possible and refer and/or seek advice to the local authority children's social work service and/or police.
- We will be alert to the threats children may face from outside their families, such as that posed by organised crime groups such as county lines and child sexual exploitation, online use and from within peer groups and the wider community.
- Where we believe that a child in our care or that is known to us may be affected by any of these factors we follow the procedures below for reporting child protection and child in need concerns and follow the local procedures as published by the local safeguarding partners.
- Where such indicators are apparent, the child's key person makes a dated record of the details of the concern and discusses what to do with the member of staff who is acting as the designated person. The information is stored on the child's personal file.
- In the event that a staff member or volunteer is unhappy with the decision made of the designated person in relation to whether to make a safeguarding referral they must follow escalation procedures.
- We refer concerns about children's welfare to the local authority children's social care team and co-operate fully in any subsequent investigation. NB In some cases this may mean the police or another agency identified by the local safeguarding partners.
- We respond to any disclosures sensitively and appropriately and take care not to influence the outcome either through the way we speak to children or by asking questions of children (although we may check out/clarify the details of what we think they have told us with them).
- We take account of the need to protect young people aged 16-19 as defined by the Children Act 1989. This may include students or school children on work placement, young employees or young parents. Where abuse or neglect is suspected we follow the procedure for reporting any other child protection

concerns. The views of the young person will always be taken into account in an age appropriate way, but the setting may override the young person's refusal to consent to share information if it feels that it is necessary to prevent a crime from being committed or intervene where one may have been, or to prevent harm to a child or adult. Sharing confidential information without consent is done only where not sharing it could be worse than the outcome of having shared it.

- All staff are also aware that adults can also be vulnerable and know how to refer adults who are in need of community care services.
- All staff know that they can contact the NSPCC whistleblowing helpline if they feel that or organisation and the local authority have not taken appropriate action to safeguard a child and this has not been addressed satisfactorily through organisational escalation and professional challenge procedures.
- We have a whistleblowing policy in place.
- Staff/volunteers know they can contact the organisation Public Concern at Work for advice relating to whistleblowing dilemmas.

Recording suspicions of abuse and disclosures

- Where a child makes comments to a member of staff that give cause for concern (disclosure), or a member of staff observes signs or signals that give cause for concern, such as significant changes in behaviour; deterioration in general well-being; unexplained bruising, marks or signs of possible abuse or neglect; that member of staff:
 - listens to the child, offers reassurance and gives assurance that she or he will take action;
 - does not question the child, although it is OK to ask questions for the purposes of clarification;
 - makes a written record that forms an objective record of the observation or disclosure that includes: the date and time of the observation or the disclosure; the exact words spoken by the child as far as possible; the name of the person to whom the concern was reported, with the date and time; and the names of any other person present at the time.
- These records are signed and dated and kept in the child's personal file, which is kept securely and confidentially.
- The member of staff acting as the designated person is informed of the issue at the earliest opportunity, and always within one working day.
- Where the local safeguarding partners safeguarding procedures stipulates the process for recording and sharing concerns, we include those procedures alongside this procedure and follow the steps set down by the local safeguarding partners.

Making a referral to the local authority children's social care team

- *Safeguarding Children* (**Alliance Publication**) contains procedures to help in making a referral to the local children's social care team, as well as template forms for recording concerns and to assist with making a referral.

- We keep a copy of this document alongside the procedures for recording and reporting set down by our local safeguarding partners, which we follow where local procedures differ from those of the Early Years Alliance.

Escalation process

- If we feel that a referral made has not been dealt with properly or that concerns are not being addressed or responded to, we will follow the LSPs escalation process.
- We will ensure that staff are aware of how to escalate concerns.
- We will follow local procedures published by safeguarding partners to resolve professional disputes.

Informing parents

- Parents are normally the first point of contact. Concerns are normally discussed with parents to gain their view of events, unless it is felt that this may put the child or other person at risk, or may interfere with the course of a police investigation, or may unduly delay the referral, or unless it is otherwise unreasonable to seek consent. Advice will be sought from social care, or in some circumstances police, where necessary.
- Parents are informed when we make a record of concerns in their child's file and that we also make a note of any discussion we have with them regarding a concern.
- If a suspicion of abuse warrants referral to social care, parents are informed at the same time that the referral will be made, except where the procedures of the local safeguarding partners does not allow this, for example, where it is believed that the child may be placed at risk.
- This will usually be the case where the parent is the likely abuser or where sexual abuse may have occurred.
- If there is a possibility that advising a parent beforehand may place a child at greater risk (or interfere with a police response) the designated person should consider seeking advice from children's social care, about whether or not to advise parents beforehand, and should record and follow the advice given.

Liaison with other agencies and multi-agency working

- We work within the local safeguarding partners guidelines.
- The current version of 'What to do if you're worried a child is being abused' is available for parents and staff and all staff are familiar with what they need to do if they have concerns.
- We have procedures for contacting the local authority regarding child protection issues and concerns about children's welfare, including maintaining a list of names, addresses and telephone numbers of social workers, to ensure that it is easy, in any emergency, for the setting and children's social care to work well together.
- We notify Ofsted of any incident or accident and any changes in our arrangements which may affect the well-being of children or where an allegation of abuse is made against a member of staff (whether the allegations relate to harm or abuse committed on our premises or elsewhere). Notifications to Ofsted are made as soon as is reasonably practicable, but at the latest within 14 days of the allegations being made.

- Contact details for the local National Society for the Prevention of Cruelty to Children (NSPCC) are also kept.

Allegations against staff and persons in position of trust

- We ensure that all parents know how to complain about the behaviour or actions of staff or volunteers within the setting, or anyone living or working on the premises occupied by the setting, which may include an allegation of abuse.
- We ensure that all staff volunteers and anyone else working in the setting knows how to raise concerns that they may have about the conduct or behaviour of other people including staff/colleagues.
- We differentiate between allegations, and concerns about the quality of care or practice and complaints and have a separate process for responding to complaints.
- We respond to any inappropriate behaviour displayed by members of staff, volunteer or any other person living or working on the premises, which includes:
 - inappropriate sexual comments;
 - excessive one-to-one attention beyond the requirements of their usual role and responsibilities, or inappropriate sharing of images
- We will recognise and respond to allegations that a person who works with children has:
 - behaved in a way that has harmed a child, or may have harmed a child
 - possibly committed a criminal offence against or related to a child
 - behaved towards a child or children in a way that indicates they may pose a risk of harm to children
- We respond to any concerns raised by staff and volunteers who know how to escalate their concerns if they are not satisfied with our response
- We respond to any disclosure by children or staff that abuse by a member of staff or volunteer within the setting, or anyone living or working on the premises occupied by the setting, may have taken, or is taking place, by first recording the details of any such alleged incident.
- We refer any such complaint immediately to a senior manager within the organisation and the **LADO** as necessary to investigate and/or offer advice.
- We also report any such alleged incident to Ofsted, as well as what measures we have taken. We are aware that it is an offence not to do this.
- We co-operate entirely with any investigation carried out by children's social care in conjunction with the police.
- Where the management team and children's social care agree it is appropriate in the circumstances, the member of staff or volunteer will be suspended for the duration of the investigation. This is not an indication of admission that the alleged incident has taken place, but is to protect the staff, as well as children and families, throughout the process. Where it is appropriate and practical and agreed with the **LADO**, we will seek to offer an alternative to suspension for the duration of the investigation, if an alternative is available that will safeguard children and not place the affected staff or volunteer at risk.

Disciplinary action

Where a member of staff or volunteer has been dismissed due to engaging in activities that caused concern for the safeguarding of children or vulnerable adults, we will notify the Disclosure and Barring Service of relevant information, so that individuals who pose a threat to children and vulnerable groups can be identified and barred from working with these groups.

Key commitment 3

We are committed to promoting awareness of child abuse issues throughout our training and learning programmes for adults. We are also committed to empowering children through our early childhood curriculum, promoting their right to be strong, resilient and listened to.

Training

- Training opportunities are sought for all adults involved in the setting to ensure that they are able to recognise the signs and signals of possible physical abuse, emotional abuse, sexual abuse (including child sexual exploitation) and neglect and that they are aware of the local authority guidelines for making referrals. Training opportunities should also cover extra familial threats such as online risks, radicalisation and grooming, and how to identify and respond to families who may be in need of early help, and organisational safeguarding procedures.
- Designated persons receive appropriate training, as recommended by the local safeguarding partners every two years and refresh their knowledge and skills at least annually.
- We ensure that all staff know the procedures for reporting and recording any concerns they may have about the provision.
- We ensure that all staff receive updates on safeguarding via emails, newsletters, online training and/or discussion at staff meetings at least once a year.

Planning

- The layout of the rooms allows for constant supervision. No child is left alone with staff or volunteers in a one-to-one situation without being within sight and/or hearing of other staff or volunteers.

Curriculum

- We introduce key elements of keeping children safe into our programme to promote the personal, social and emotional development of all children, so that they may grow to be strong, resilient and listened to and so that they develop 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 children's heritage arising from their colour, ethnicity, languages spoken at home, cultural and social background.
- We ensure that this is carried out in a way that is developmentally appropriate for the children.

Confidentiality

- All suspicions and investigations are kept confidential and shared only with those who need to know. Any information is shared under the guidance of the local safeguarding partners and in line with the GDPR, Data Protection Act 2018, and Working Together 2018.

Support to families

- We believe in building trusting and supportive relationships with families, staff and volunteers.
- We make clear to parents our role and responsibilities in relation to child protection, such as for the reporting of concerns, information sharing, monitoring of the child, and liaising at all times with the local children's social care team.
- We will 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 worker in relation to the setting's designated role and tasks in supporting that child and their family, subsequent to any investigation.
- We will engage with any child in need plan or early help plan as agreed.
- Confidential records kept on a child are shared with the child's parents or those who have parental responsibility for the child in accordance with the Confidentiality and Client Access to Records procedure, and only if appropriate under the guidance of the local safeguarding partners.

Legal framework

Primary legislation

- Children Act (1989 s47)
- Protection of Children Act (1999)
- The Children Act (2004 s11)
- Children and Social Work Act 2017
- Safeguarding Vulnerable Groups Act (2006)
- Care Act 2014
- Child Safeguarding Practice Review and Relevant Agency (England) Regulations 2018
- General Data Protection Regulations (GDPR) (2018)
- Counter-Terrorism and Security Act 2015
- Modern Slavery Act 2015
- Sexual Offences Act 2003
- Serious Crime Act 2015
- Criminal Justice and Court Services Act (2000)
- Human Rights Act (1998)
- Equalities Act (2006)
- Equalities Act (2010)
- Disability Discrimination Act (1995)
- Freedom of Information Act (2000)

Further Guidance

Working Together to Safeguard Children (HMG 2023)

Statutory Framework for the Early Years Foundation Stage 2023

What to Do if You're Worried a Child is Being Abused (HMG 2015)

Prevent duty guidance for England and Wales: guidance for specified authorities in England and Wales on the duty of schools and other providers in the Counter-Terrorism and Security Act 2015 to have due regard to the need to prevent people from being drawn into terrorism' (HMG 2015)

Keeping Children Safe in Education 2022

Education Inspection Framework (Ofsted 2023)

The framework for the assessment of children in need and their families (DoH 2000)

The Common Assessment Framework (2006)

The Common Assessment Framework (CAF) – guide for practitioners (CWDC 2010)

The Common Assessment Framework (CAF) – guide for managers (CWDC 2010)

Statutory guidance on inter-agency working to safeguard and promote the welfare of children (DfE 2015)

Information sharing advice for safeguarding practitioners (DfE 2018)

The Team Around the Child (TAC) and the Lead Professional (CWDC 2009)

Multi-Agency Statutory Guidance on Female Genital Mutilation (HMG. 2016)

Multi-Agency Public Protection Arrangements (MAPPA) (Ministry of Justice, National Offender Management Service and HM Prison Service 2014)

Safeguarding Children from Abuse Linked to a Belief in Spirit Possession (HMG 2010)

Safeguarding Children in whom Illness is Fabricated or Induced (HMG 2007)

Safeguarding Disabled Children: Practice Guidance (DfE 2009)

Safeguarding Children who may have been Trafficked (DfE and Home Office 2011)

Child sexual exploitation: definition and guide for practitioners (DfE 2017)

NSPCC 24-hour FGM helpline: 0800 028 3550 or email fgmhelp@nspcc.org.uk

Government help and advice: www.gov.uk/female-genital-mutilation

Accident Record ([Alliance Publication](#))

Safeguarding children

Low level concerns and allegations of serious harm or abuse against staff or volunteers.

Concerns may come from a parent, child, colleague or member of the public. Allegations or concerns must be referred to the designated person without delay - even if the person making the allegation later withdraws it.

What is a low-level concern?

The NSPCC defines a low-level concern as *'any concern that an adult has acted in a way that:*

- *is inconsistent with the staff code of conduct, including inappropriate conduct outside of work*
- *doesn't meet the threshold of harm or is not considered serious enough...to refer to the local authority.*

Low-level concerns are part of a spectrum of behaviour. This includes:

- *inadvertent or thoughtless behaviour*
- *behaviour that might be considered inappropriate depending on the circumstances*
- *behaviour which is intended to enable abuse*

Examples of such behaviour could include:

- *being over friendly with children*
- *having favourites*
- *adults taking photographs of children on their mobile phone*
- *engaging with a child on a one-to-one basis in a secluded area or behind a closed door*
- *using inappropriate sexualised, intimidating or offensive language'*

(NSPCC [Responding to low-level concerns about adults working in education](#))

Responding to low-level concerns

Any low-level concerns about the conduct of staff, students or volunteers must be shared with the designated person and recorded on a Low level concerns form. The designated person should be informed of all low-level concerns and make the final decision on how to respond. Where appropriate this can be done in consultation with their line manager.

Reporting low-level concerns about the conduct of a colleague, student or volunteer contributes towards a safeguarding culture of openness and trust. It helps ensure that adults consistently model the setting's values and helps keep children safe. It protects adults working in the setting from potential false allegations or misunderstandings.

If it is not clear that a low-level concern meets the local authority threshold, the designated person should contact the **LADO** for clarification.

In most instances, low-level concerns about staff conduct can be addressed through supervision, training, or disciplinary processes where an internal investigation may take place.

Identifying

An allegation against a member of staff, volunteer or agency staff constitutes serious harm or abuse if they:

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

Informing

- All staff report allegations to the designated **safeguarding** lead.
- The designated person alerts the designated officer. If the designated officer is unavailable the designated person contacts their equivalent until they get a response- which should be within 3-4 hours of the event. Together they should form a view about what immediate actions are taken to ensure the safety of the children and staff in the setting, and what is acceptable in terms of fact-finding.
- It is essential that no investigation occurs until and unless the **LADO** has expressly given consent for this to occur, however, the person responding to the allegation does need to have an understanding of what explicitly is being alleged.
- The designated **safeguarding lead** must take steps to ensure the immediate safety of children, parents, and staff on that day within the setting.
- The **LADO** is contacted as soon as possible and within one working day. If the **LADO** is on leave or cannot be contacted the **LADO** team manager is contacted and/or advice sought from the point of entry safeguarding team/mash/point of contact, according to local arrangements.
- A child protection referral is made by the designated person if required. The **LADO**, line managers and local safeguarding children's services can advise on whether a child protection referral is required.
- The designated person asks for clarification from the **LADO** on the following areas:
 - what actions the designated person must take next and when and how the parents of the child are informed of the allegation
 - whether or not the **LADO** thinks a criminal offence may have occurred and whether the police should be informed and if so who will inform them
 - whether the **LADO** is happy for the setting to pursue an internal investigation without input from the **LADO**, or how the **LADO** wants to proceed

- whether the LADO thinks the person concerned should be suspended, and whether they have any other suggestions about the actions the designated person has taken to ensure the safety of the children and staff attending the setting
- The designated person records details of discussions and liaison with the LADO including dates, type of contact, advice given, actions agreed and updates on the child's case file.
- Parents are not normally informed until discussion with the LADO has taken place, however in some circumstances the designated person may need to advise parents of an incident involving their child straight away, for example if the child has been injured and requires medical treatment.
- Staff do not investigate the matter unless the LADO has specifically advised them to investigate internally. Guidance should also be sought from the LADO regarding whether or not suspension should be considered. The person dealing with the allegation must take steps to ensure that the immediate safety of children, parents and staff is assured. It may be that in the short-term measures other than suspension, such as requiring a staff member to be office based for a day, or ensuring they do not work unsupervised, can be employed until contact is made with the LADO and advice given.
- The designated safeguarding lead ensures staff fill in a Safeguarding incident reporting form.
- If after discussion with the designated person, the LADO decides that the allegation is not obviously false, and there is cause to suspect that the child/ren is suffering or likely to suffer significant harm, then the LADO will normally refer the allegation to children's social care.
- If notification to Ofsted is required the designated person will inform Ofsted as soon as possible, but no later than 14 days after the event has occurred. The designated safeguarding lead will liaise with the designated officer about notifying Ofsted.
- The designated safeguarding lead ensures that the Confidential safeguarding incident report form is completed and sent to the designated officer. If the designated officer is unavailable their equivalent must be contacted.
- Avenues such as performance management or coaching and supervision of staff will also be used instead of disciplinary procedures where these are appropriate and proportionate. If an allegation is ultimately upheld the LADO may also offer a view about what would be a proportionate response in relation to the accused person.
- The designated safeguarding lead must consider revising or writing a new risk assessment where appropriate, for example if the incident related to an instance where a member of staff has physically intervened to ensure a child's safety, or if an incident relates to a difficulty with the environment such as where parents and staff are coming and going and doors are left open.
- All allegations are investigated even if the person involved resigns or ceases to be a volunteer.

Allegations against agency staff

Any allegations against agency staff must be responded to as detailed in this procedure. In addition, the designated person must contact the agency following advice from the **LADO**.

Allegations against the designated person

- If a member of staff has concerns that the designated person has behaved in a way that indicates they are not suitable to work with children as listed above, this is reported to the designated officer who will investigate further.
- During the investigation, the designated officer will identify another suitably experienced person to take on the role of designated person.
- If an allegation is made against the designated officer, then the owners/directors/trustees are informed.

Recording

- A record is made of an allegation/concern, along with supporting information, using a Low level concerns form. This is then entered on the file of the child, and the Child welfare and protection summary is completed and placed in the front of the child's file.
- If the allegation refers to more than one child, this is recorded in each child's file
- If relevant, a child protection referral is made, with details held on the child's file.

Disclosure and Barring Service

- If a member of staff is dismissed because of a proven or strong likelihood of child abuse, inappropriate behaviour towards a child, or other behaviour that may indicate they are unsuitable to work with children such as drug or alcohol abuse, or other concerns raised during supervision when the staff suitability checks are done, a referral to the Disclosure and Barring Service is made.

Escalating concerns

- If a member of staff believes at any time that children may be in danger due to the actions or otherwise of a member of staff or volunteer, they must discuss their concerns immediately with the designated person.
- If after discussions with the designated person, they still believe that appropriate action to protect children has not been taken they must speak to the designated officer.
- If there are still concerns then the whistle blowing procedure must be followed.

What to do if you are worried a child is being abused or neglected

for staff, volunteers and visitors in all agencies and settings

Be alert to signs of abuse and question unusual behaviour

If you have concerns about a child's welfare...

Where a child also discloses abuse or neglect:

- Listen; take their allegation seriously; reassure that you will take action to keep them safe
- Inform them what you are going to do next
- Do not promise confidentiality
- Do not question further or approach/inform the alleged abuser

Report concerns to the Designated/Named Safeguarding Lead or their deputy:

NAME.....Ann Uzzell.....

The Designated/Named Safeguarding Lead will:

- consider further actions required, including consultation with MASH (number below)
- record in writing the discussions, decisions and reasons for decisions.

In exceptional circumstances or in the absence of a Safeguarding Lead you may contact MASH directly.

If a referral is not required:

The Designated Safeguarding Lead will oversee relevant action, eg pastoral support, and/or early help assessment and monitor locally.

If concerns continue

The Designated/Named Safeguarding Lead (or staff) will contact MASH to make a referral

Additional/unmet needs – the Designated Safeguarding Lead will consult with relevant agencies and undertake an Early Help CAF and Team around the Child meetings.

- **Multi-Agency Safeguarding Hub (MASH): 0300 456 0108**
- **Out of Hours Emergency Duty Service: 0300 456 0100** (5.00pm to 9.00am weekdays, 4:00pm Friday to 9:00am Monday)
- If the child is in **immediate risk**, dial **999** and ask for police assistance

MASH will:

1. Acknowledge receipt of referral
2. Decide on next course of action (within 1 working day)
3. Provide feedback decision to referrer (e.g. further assessment including: strategy discussion/child protection enquiries; no further action required for children's social care and early help assessment/CAF recommended; referral to other agency for service provision).

This flowchart is intended for use as a brief guide. Refer to the DfE Guidance [What to do if you are worried a child is being abused](#) for more information, definitions and possible indicators of abuse (including child sexual exploitation).



Allegations and concerns against adults in education settings – April 2024 (including schools, early years and alternative provision settings)

If you become aware that a member of staff/volunteer/supply/contractor/bank staff and those from organisations or individuals using the school premises, MAY have:

- 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

If you have any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work and
- does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO.

Examples of such behaviour could include, but are not limited to:

- Being over friendly with children
- Having favourites
- Taking photographs of children on their mobile phone, contrary to school policy
- Engaging with a child on a one-to-one basis in a scheduled area or behind a closed door; or,
- Humiliating pupils

Where a child also discloses abuse or neglect by a member of staff/volunteer/supply/contractor/bank staff and those from organisations or individuals using the school premises:

- Listen; take their allegation seriously; reassure that you will take action to keep them safe
- Inform them what you are going to do next
- Do not promise confidentiality
- Do not question further or approach/inform the person/alleged abuser

Staff should self-refer to their line manager or Designated Safeguarding Lead where they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

Report immediately to the person in charge: (INSERT NAME) Ann Uzzell (Preschool Manager)

Eg headteacher, principal, manager

Any concern or allegation against the person in charge will be reported to: (INSERT NAME): Kerri Clear (Committee Chair)

Eg chair of governor, owner, chair of committee, nominated trustee

Unless there is clear evidence to prove that the allegation is incorrect, the person in charge will decide on the nature of the allegation/concern:

Allegations that may meet the harm threshold

If the behaviour towards the child may have met the harm threshold (KCSiE 2023, p.87) report the allegation **within one working day** to the Local Authority Designated Officer (LADO) and your HR provider

- Contact the Multi-Agency Safeguarding Hub (MASH): 0300 456 0108 and select Option 6 or email LADOservice@wiltshire.gov.uk
- Out of Hours Emergency Duty Service: 0300 456 0100 (5pm to 9am weekdays, 4pm Friday to 9am Monday)

Allegations/concerns that do not meet the harm threshold (low-level concerns)

Refer to the allegation/concerns that do not meet the harm threshold, or 'low level' concerns addendum flowchart (below).



Allegation/concerns guidance for persons in charge – April 2024



Allegations that may meet the harm threshold

KCSIE 2023 Part 4 Section 1

The LADO will:

1. Consider the relevant facts and concerns regarding the adult and child or children, including any previous history
2. Decide on next course of action - usually straight away, sometimes after further consultation with other multi-agency parties such as the Police and HR.

If the allegation threshold is met:

- A strategy meeting will normally be held.
- Usually, a senior manager/safeguarding lead, the LADO, HR, Police and social care are invited to attend.
- Relevant information is shared, risks to children are considered and appropriate action agreed eg child protection and other enquiries, disciplinary measures or criminal proceedings.
- A record of the meeting will be made, and regular reviews will take place until a conclusion is reached.

If the allegation threshold is NOT met:

The LADO will agree an appropriate response, eg for the setting to undertake further enquiries or an internal investigation.

Refer to the low-level concerns procedures on the right-hand-side.

Allegations/concerns that do NOT meet the harm threshold ('low level' concerns)

KCSIE 2023 Part 4 Section 2

The person in charge will take the following actions:

- Reports about supply staff and contractors will be notified to their employers.
- Collect information to help them categorise the type of behaviour and determine what further action may need to be taken.
- If the concern has been raised via a third party, the person in charge (or a nominated deputy) should collect as much evidence as possible by speaking:
 - directly to the person who raised the concern, unless it has been raised anonymously, and
 - to the individual involved and any witnesses.
- All low-level concerns will be recorded in writing and will include details of the concern, the context in which the concern arose along with the rationale for decisions and action taken.
- Records will be kept confidential and held securely; it is recommended that it is retained at least until the individual leaves their employment.
- Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified.
- Where a pattern of such behaviour is identified, the school or college should decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a low-level concern to meeting the harm threshold, in which case it should be referred to the LADO (as per Part 4, Section 1).
- Consideration should also be given to whether there are wider cultural issues within the school or college that enabled the behaviour to occur and where appropriate policies could be revised, or extra training delivered to minimise the risk of it happening again.
- The person in charge will seek advice from HR adviser and/or LADO consultation as appropriate.

Allegation/concerns that do not meet the harms threshold – ‘low level’ concerns.
(KCSiE 2021, para 407)

The term ‘low-level’ concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the harms threshold. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’ - that an adult working in or on behalf of the school or college may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the DOFA.

Examples of such behaviour could include, but is not limited to:

- **Being over friendly with children;**
- **Having favourites;**
- **Taking photographs of children on their mobile phone;**
- **Engaging with a child on a one-to-one basis in a scheduled area or behind a closed door; or,**
- **Using inappropriate sexualised, intimidating, or offensive language**
- **Low-level concerns as set out within settings staff behaviour/code of conduct and safeguarding policy.**



All staff have a responsibility to share any low-level concerns about a member of staff, supply staff, volunteer, or contractor immediately to the person in charge:

Ann Uzzell.....

Any concern or allegation against the person in charge will be reported to:

Kerri Clear.....

Staff should self-refer to their line manager or Designated Safeguarding Lead where they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.



The Designated Safeguarding Lead will take the following actions:

- Reports about supply staff and contractors will be notified to their employers.
- The (insert role) will collect information to help them categorise the type of behaviour and determine what further action may need to be taken. Actions will be responsive, sensitive and proportionate.
- All low-level concerns will be recorded in writing and will include details of the concern, the context in which the concern arose along with the rationale for decisions and action taken.
- Records will be kept confidential and held securely and will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified.
- The (insert role) will seek advice from HR adviser and/or DOFA consultation as appropriate.