MADELEY NURSERY SCHOOL

Child Protection and Safeguarding Policy

Commitment to review

This policy will be flexible to change and will be reviewed on an ongoing basis to reflect where there are any changes in government legislation or any changes in the duty of statutory agencies in child protection and/or the wider safeguarding agenda. If it is not appropriate to refine the policy during the year, then this will be done as a matter of course on yearly basis by a named person responsible below, who shall be accountable for that action.

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Our safeguarding team		
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Summary & aims

We have regard for the statutory guidance from the Department for Education (DfE) issued under Section 175 of the Education Act 2002, the Education (Independent School Standards) Regulations 2014, the Non-Maintained Special Schools (England) Regulations 2015 and the Education and training (Welfare of Children) Act 2021. This policy has been developed in line with legal obligations, including, where applicable, the Human Rights Act 1998, the European Convention on Human Rights, the Domestic Abuse Act 2021, the Children and Social Work Act 2017, the Equality Act 2010 and the Public Sector Equality Duty.

We will adhere to the statutory guidance Working Together to Safeguard Children 2018 and Keeping Children Safe in Education 2021 (KCSIE). We will follow the DfE of What to do if you are Worried a Child is Being Abused - Advice for Practitioners, and have regard to Sexual violence and sexual harassment between children in schools and colleges (September 2021). We recognise the NSPCC website also provides us additional information on abuse and neglect and what to look out for.

We provide early years provision and adhere to the Statutory Framework for the Early Years Foundation Stage 2021 (EYFS).

All child protection matters will be dealt with in line with the arrangements of Telford and Wrekin Safeguarding Partnership (TWSP) and West Midlands Child Protection and Safeguarding Procedures or, if relevant, the safeguarding partnership area children reside in or are under the care of.

This policy replaces the previous policy of September 2020.

We have a duty of care to all staff, pupils and their families. The safety and protection of all children is of paramount importance to all those involved in education. The aim of this policy is to make all within our setting feel safe, promote their welfare and have clear roles and responsibilities in place for that to happen. We are committed to inter-agency working to keep children safe. All of our community believe that our setting should provide a caring, positive, safe and stimulating environment, which promotes the social, physical and moral development of the individual child.

The governing body of Madeley Nursery will ensure that **all staff** have read at least part one of KCSIE (or annex A if appropriate) and those working with children will also read Annex B of KCSIE. All members of the governing body and the Designated Safeguarding Lead (DSL) and their deputies will read all parts of KCSIE, relevant parts of Working Together to Safeguard Children and Part three: safeguarding and welfare of the EYFS. We will maintain a record of this. We recognise that best practice would be for all staff to be acquainted with all parts of KCSIE. The governing body will ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities as set out in Part one (or Annex A if appropriate) of KCSIE.

Our policy and all supplementary policies are procedures are published on our website for all to view.

Part one: Safeguarding information

Our approach to safeguarding

All of our staff are an important part of the wider safeguarding system for our pupils.

It is everyone's responsibility to safeguard and promote the welfare of children; this includes everyone who comes into contact with children and their families. Everyone will consider, at all times, what is in the best interest for the child and ensure their practice is child-centred.

No one will manage concerns about a child in insolation. **Everyone** will identify concerns, share information and take prompt action to help children and families receive the right help at the right time.

For the purpose of this policy, safeguarding and promoting the welfare of children is defined as:

- protecting children from maltreatment.
- preventing impairment of children's mental and physical health or development.
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children to have the best outcomes.

Children includes everyone under the age of 18.

The role of our staff

Our staff will identify concerns early, provide help for children, and prevent concerns from escalating. They will provide a safe environment in which children can learn.

We are committed to identifying children who may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a child's life.

The DSL and their deputies role is to advise on safeguarding concerns, support others to carry out their safeguarding duties and liaise with other agencies.

All teachers, including the Headteacher in accordance with the Teachers' Standards 2012 will safeguard children's well-being and maintain public trust in the teaching profession as part of their professional duties.

Staff training and induction

All staff will receive an induction, so they are aware of our safeguarding systems. This will include the child protection policy, behaviour policy, staff behaviour policy, safeguarding response to children who go missing and role of the DSL (including the identity of the DSL and any deputies). We will provide copies of policies and a copy of Part one (or Annex A, if appropriate) or KCSIE to all staff at induction.

Staff will receive appropriate safeguarding and child protection training (including online safety) at induction. This training will be updated regularly (as a minimum every three years). All staff will also receive at least annual child protection and safeguarding updates, to provide them with relevant skills and knowledge to safeguard children effectively.

All staff will be made aware of the following:

- Telford & Wrekin early help process and their role within it.
- the process for making referrals to children's social care and for statutory assessments under the Children Act 1989 and the role they might be expected to play in such assessments, and
- what to do if a child tells them he/she is being abused, exploited, or neglected.

Staff know how to manage the requirement to maintain an appropriate level of confidentiality. This means only involving those who need to be involved, such as the DSL (or a deputy) and children's social care. Staff will never promise a child that they will not tell anyone about a report of any form of abuse, as this may ultimately not be in the best interests of the child. All staff will reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim will never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor will a victim ever be made to feel ashamed for making a report.

Early help

We believe that **any** child may benefit from early help, and we ensure that all staff are alert to the potential need for early help for a child who:

- is disabled or has certain health conditions and has specific additional needs.
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan);
- has a mental health need
- is a young carer;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
- is frequently missing/goes missing from care or from home;
- is at risk of modern slavery, trafficking or exploitation;
- is at risk of being radicalised or exploited;
- has a family member in prison, or is affected by parental offending;
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
- is misusing drugs or alcohol themselves;
- has returned home to their family from care;
- is at risk of 'honour'-based such as Female Genital Mutilation or Forced Marriage;
- is a privately fostered child; and
- is persistently absent from education, including persistent absences for part of the school day.

Abuse and neglect

All staff are trained on the indicators of abuse and neglect to help them to identify children who may be in need of help or protection. We believe that abuse, neglect and safeguarding issues are rarely stand-alone events. All staff are aware that safeguarding incidents and/or behaviours can be associated with factors outside the setting and/or can occur between children outside of these environments. All staff, but especially the DSL and deputies will consider whether children are at risk of abuse or exploitation in situations outside their families. Staff will be vigilant and always raise any concerns with their DSL (or deputy), even if they are unsure.

All staff are aware that technology is a significant component in many safeguarding and wellbeing issues. We understand children are at risk of abuse online as well as face-to-face. In many cases, abuse will take place concurrently via online channels and in daily life. Children can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

Indicators of abuse and neglect

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child. The fabrication or induction of illness (FII) in children is a relatively rare form of child abuse. Where concerns exist about FII, it requires professionals to work together, evaluating all the available evidence, in order to reach an understanding of the reasons for the child's signs and symptoms of illness. At all times professionals need to keep an open mind to ensure that they have not missed a vital piece of information'. We adopt the guidance Safeguarding children in whom illness is fabricated or induced and TWSP FII Best Practice Guidance.

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff are aware of the settings policy and procedures of dealing with this.

Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Safeguarding issues

All staff are trained on safeguarding issues that can put children at risk of harm.

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

We recognise both CSE and CCE are forms of abuse. They both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved for the purpose of exploitation.

Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim.

Whilst the age of the child may be a contributing factor for an imbalance of power, there are a range of other factors that could make a child more vulnerable to exploitation, including, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic or other resources.

Some of the following can be indicators of both child criminal and sexual exploitation where children:

- appear with unexplained gifts, money or new possessions;
- associate with other children involved in exploitation;
- suffer from changes in emotional well-being;
- misuse drugs and alcohol;
- go missing for periods of time or regularly come home late; and
- regularly miss school or education or do not take part in education.

We will provide additional support to children who have been exploited to help maintain them in education.

Staff understand that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, they are aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

If we feel that children may be being abused through exploitation, we will consult in the normal way with the relevant local authority social care team to seek advice. In Telford & Wrekin we will consider whether the incident follows a CSE care and support Pathway. The concerns will be followed through sensitively and appropriately with fellow professionals and the CSE referral form will be completed. In relation to the fortnightly CATE Risk Panels, where concerns are expressed around a child attending our setting, we will ensure attendance whenever possible as part of the established multi-agency process. Alongside this, we have taken the same steps and made all staff aware of the TWSP A guide for professionals CATE leaflet. Due to the high number of reports in our borough, we will be particularly alert to the CSE and CCE.

We will make parents and carers, and children and young people aware of the relevant TWSP CATE leaflets. We will provide them with information on CEOP the Child Exploitation and Online Protection command. Children and adults can use CEOP to report if they are concerned that a child is being sexually abused or groomed online.

Child Criminal Exploitation (CCE)

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

We recognise that this type of exploitation can trap children as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

Child Sexual Exploitation (CSE)

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. It may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media.

Some additional specific indicators that may be present in CSE are children who:

- have older boyfriends or girlfriends; and
- suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

We will make the following further information on signs of a child's involvement in sexual exploitation available to staff. Child sexual exploitation: guide for practitioners

County lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of "deal line". This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can be targeted and recruited into county lines in a number of locations including our setting, other education settings, children's homes and care homes.

Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

A number of the indicators for CSE and CCE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- go missing and are subsequently found in areas away from their home;
- have been the victim or perpetrator of serious violence (e.g. knife crime);
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs;
- are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection;
- are found in accommodation that they have no connection with, often called a 'trap house or cuckooing' or hotel room where there is drug activity;
- owe a 'debt bond' to their exploiters; and
- have their bank accounts used to facilitate drug dealing.

We will make the Home Office guidance on the signs of a child's involvement in county lines available to staff.

If a child is suspected to be at risk of or involved in county lines, a safeguarding referral will also be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation, such as CLIMB.

Modern Slavery and the National Referral Mechanism (NRM)

Staff understand that Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

We know that information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance.

Mental Health

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

We recognise only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. Staff will be made aware of how these children's experiences; can affect their mental health, behaviour, and education.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, by speaking to the DSL or a deputy and recording their concern.

We will follow the DfE guidance on Mental Health and Behaviour in Schools.

Please refer to our Mental Health & Well-being policy.

Peer on peer abuse (child on child)

All staff are aware that children can abuse other children we refer to this as peer-on-peer abuse. This can happen inside or outside of our setting and online. If staff have **any** concerns regarding peer-on-peer abuse, even if there are no reports in our setting, they should still speak to the DSL (or deputy).

All staff are expected to challenge inappropriate behaviours between peers, many of which are listed below, that are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

Peer on peer abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an element of online which facilitates, threatens and/or encourages physical abuse);
- sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence);

- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual sharing of nudes and semi nudes images and or videos (also known as sexting or youth produced sexual imagery);
- up-skirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm;
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

All staff will be trained in our settings policy and procedures with regards to peer-on-peer abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it.

We will actively seek to raise awareness of and prevent all forms of peer-on-peer abuse by:

- educating all governors, its senior leadership team, staff, students, and parents about this issue;
- educating children about the nature and prevalence of peer-on-peer abuse, positive, responsible and safe use of social media, and the unequivocal facts about consent, via the curriculum;
- engaging parents on these issues;
- supporting the on-going welfare of the student body by drawing on multiple resources that prioritise student mental health, and by providing in-school counselling and therapy to address underlying mental health needs;
- working with governors, senior leadership team, and all staff, students and parents to address equality issues, to promote positive values, and to encourage a culture of tolerance and respect amongst all members of the school community;
- creating conditions in which our students can aspire to, and realise, safe and healthy relationships fostering a whole school culture;
- responding to cases of peer-on-peer abuse promptly and appropriately; and
- ensuring that all peer-on-peer abuse issues are fed back to the DSL and deputies so that they can spot and address any concerning trends and identify students who may be in need of additional support.

We will actively engage with TWSP in relation to peer-on-peer abuse, and work closely with, for example, children's social care, the police and other schools. The relationships our setting has built with these partners is essential to ensuring that we are able to prevent, identify early, and appropriately handle cases of peer-on-peer abuse. The DSL (or deputy) will regularly review behaviour incident logs which can help to identify any changes in behaviour and/or concerning patterns or trends at an early stage.

We recognise that any child can be vulnerable to peer-on-peer abuse due to the strength of peer influence, especially during adolescence, and staff should be alert to signs of such abuse amongst all children. Individual and situational factors can increase a child's vulnerability to abuse by their peers. We know that research suggests:

- peer on peer abuse may affect boys differently from girls (i.e. that it is more likely that girls will be victims and boys perpetrators). However, all peer-on-peer abuse is unacceptable and will be taken seriously;
- children with Special Educational Needs and/or Disabilities (SEND) are three times more likely to be abused than their peers without , and
- some children may be more likely to experience peer on peer abuse than others as a result of certain characteristics such as sexual orientation, ethnicity, race or religious beliefs.

Sexual violence and sexual harassment between children

All those part of our community believe that sexual violence and sexual harassment is not acceptable and will not be tolerated.

We understand that sexual violence and sexual harassment can occur between two children **of any age and sex.** It can occur online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

We recognise that children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrators(s) attends our setting. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable.

Staff are aware that some groups are potentially more at risk. We know that evidence shows girls, children with SEND and LGBT children are at greater risk.

We will ensure that staff are aware of the importance of:

- challenging inappropriate behaviours;
- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment; and,
- challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

For the purpose of this policy, we use the term 'victim', 'alleged perpetrator(s)' or where appropriate 'perpetrator(s)'. Ultimately, the use of appropriate terminology will be determined, as appropriate, on a case-by-case basis.

Along with providing support to children who are victims of sexual violence or sexual harassment, we will provide the alleged perpetrator(s) with an education, safeguarding support as appropriate and implement any disciplinary sanctions. We recognise that a child abusing another child may be a sign they have been abused themselves or a sign of wider issues that require addressing within the culture of our setting. Taking disciplinary action and providing appropriate support, can, and should, occur at the same time if necessary.

We understand that reports of sexual violence and sexual harassment are extremely complex to manage. We know it is essential that victims are protected, offered appropriate support and every effort is made to ensure their education is not disrupted. We also know it is also important that other children, students and our staff are supported and protected as appropriate.

We will try to be aware of, and respond appropriately to **all reports and concerns**, including those outside of our setting, and or online.

Whilst the focus of this policy is on protecting and supporting children, we will of course protect any adult students and engage with adult social care, support services and the police as required.

Sexual violence

Our staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way both inside and outside of our setting. We refer to sexual violence as sexual offences under the Sexual Offences Act 2003 as described below:

Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

Causing someone to engage in sexual activity with consent: A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.)

We believe that **consent** is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g.to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

Sexual consent

- a child under the age of 13 can never consent to any sexual activity;
- the age of consent is 16;
- sexual intercourse without consent is rape.

Sexual harassment

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline both inside and outside of our setting. When we reference sexual harassment, we do so in the context of child-on-child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual "jokes" or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes and displaying pictures, photos or drawings of a sexual nature, and
- on-line sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
- consensual and non-consensual sharing of nudes and semi-nudes images and/or videos.

We will follow the guidance set out in UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people.

Upskirting

The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12 April 2019. We recognise 'Upskirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or

cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any sex, can be a victim.

Harmful sexual behaviour

Children's sexual behaviour exists on a wide continuum, from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive, and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. We use the term "harmful sexual behaviour" (HSB). **HSB can occur online and/or face to face and can also occur simultaneously between the two.** We will consider HSB in a child protection context.

We will follow the specialist support and advice on HSB available from the specialist sexual violence sector. Our DSL will undertake training in HSB and incorporate this into our approach to managing sexual violence and sexual harassment.

Addressing inappropriate behaviour **can** be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. Children displaying HSB have often experienced their own abuse and trauma. We understand it is important that they are offered appropriate support.

Our approach to preventing peer on peer on abuse, including child on child sexual violence and sexual harassment

We will undertake pre-planning, training for staff and implement an effective peer on peer abuse policy to help us develop the foundation for a calm, considered and appropriate response to any reports.

We understand the best responses to peer-on-peer abuse are based on a whole setting approach to safeguarding and child protection and we will involve our whole community in this.

Systems are in place, well promoted throughout our setting, and understandable and accessible for our pupils to confidently report abuse, sexual violence and sexual harassment, knowing their concerns will be treated seriously, and that they can safely express their views and give feedback.

All staff in our setting will undertake training in how to respond to peer-on-peer abuse, including reports of sexual violence or sexual harassment. Our DSL will undertake training to manage a report.

We accept the most effective preventative education programme will be through a whole setting approach that prepares pupils for life in modern Britain. Our setting will has a clear set of values and standards, and these will be upheld and demonstrated throughout all aspects of Madeley Nursery life. This is underpinned by our behaviour policy and pastoral support system, and by our planned programme of evidence-based content delivered through the whole curriculum. Our programme is developed to be age and stage of development appropriate. The DSL will support teachers in their delivery of this part of our curriculum. We recognise good practice allows children an open forum to talk through things. Such discussions can lead to increased safeguarding reports. Children will be made aware of the processes to raise their concerns or make a report and how any report will be handled. This will include processes when they have a concern about a friend or peer. All staff are aware of how to support children and how to manage a safeguarding report from a child.

The DSL will consider if external support or intervention is necessary as part of our approach to sexual violence and sexual harassment. We recognise specialist organisations can offer a different perspective and expert knowledge.

Our response to peer-on-peer abuse, including reports of sexual violence or sexual harassment

We will use the following guidance to assist in the managing of reports Sexual violence and sexual harassment between children in schools and colleges: advice for governing bodies, proprietors, head teachers, principals, senior leadership teams and designated safeguarding leads.

It is our aim to always recognise, acknowledge and understand the scale of harassment and abuse. We aim to never downplay some behaviours related to abuse that can lead to a culture of unacceptable behaviour, an unsafe environment and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

Where necessary we will work with other professionals, agencies, and partners in our response. This may include the TWSP partners, the relevant local authority children's social care departments, the police, the NSPCC, the Anti-Bullying Alliance and online services, such as The UK Safer Internet Centre, Internet Watch Foundation and Thinkuknow.

We recognise that children may not find it easy to tell staff about their abuse verbally. Children can show signs or act in ways that they hope adults will notice and react. In some cases, the victim may not make a direct report.

The immediate response to a report

If a member of staff thinks for whatever reason that a child may be at risk of or experiencing abuse by their peer(s), or that a child may be at risk of abusing or may be abusing their peer(s), they should discuss their concern with the DSL (or deputy) without delay.

We will reassure **all** victims that they are being taken seriously, regardless of how long it has taken them to come forward and that they will be supported and kept safe. Abuse that occurs online or outside of our setting will not be downplayed and will be treated equally seriously. We will never give a victim the impression that they are creating a problem by reporting peer on peer abuse, including sexual violence or sexual harassment. Nor will we make a victim feel ashamed for making a report.

Risk assessment

When there has been a report of sexual violence, the DSL (or a deputy) will make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment will be considered on a case-by-case basis, but as good practice should be completed.
The risk and needs assessment should consider:

- the victim, especially their protection and support;
- whether there may have been other victims,
- the alleged perpetrator(s); and
- all the other children, (and, if appropriate, adult students and staff) at the school or college, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms.

If any of the children involved has SEND, the DSL will liaise with the SENDCO to assist in the management of the report.

Risk assessments must be recorded (written or electronic) and will be kept under review. At all times, we will be actively considering the risks posed to all of our pupils and students and put adequate measures in place to protect them and keep them safe.

The DSL (or a deputy) will engage with children's social care and specialist services as required. Where there has been a report of sexual violence, it is likely that professional risk assessments by social workers and or sexual violence specialists will be required. Our risk assessment is not intended to replace the detailed assessments of expert professionals. Any such professional

assessments will be used to inform our approach to supporting and protecting our pupils and students and updating our own risk assessment.

The DSL may use and consider the TWSP Sexually harmful behaviour - risk assessment tool.

Action following a report of peer-on-peer abuse, including sexual violence and/or sexual harassment

Our DSL (and deputies) have a complete safeguarding picture and they are the most appropriate people to advise on our initial response. Important considerations will include:

- the wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. This will however need to be balanced with our duty and responsibilities to protect other children;
- the nature of the alleged incident(s), including whether a crime may have been committed and/or whether HSB has been displayed;
- the ages of the children involved;
- the developmental stages of the children involved;
- any power imbalance between the children. For example, is the alleged perpetrator(s) significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?;
- if the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature);
- that sexual violence and sexual harassment can take place within intimate personal relationships between peers;
- are there ongoing risks to the victim, other children, adult students or school or college staff; and,
- other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

As always when concerned about the welfare of a child, all staff will act in the best interests of the child. In all cases, we will follow general safeguarding principles. Immediate consideration will be given as to how best to support and protect the victim and the alleged perpetrator(s) (and any other children involved/impacted).

The starting point regarding any report will always be that there is a zero-tolerance approach to sexual violence and sexual harassment and it is never acceptable and it will not be tolerated.

As a matter of effective safeguarding practice, we will do all we reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, especially where a case is progressing through the criminal justice system.

Options to manage the report

When to inform the alleged perpetrator(s) will be a decision that will be carefully considered. Where a report is going to be made to children's social care and/or the police, then, as a general rule, we will speak to the relevant agency and discuss next steps and how the alleged perpetrator(s) will be informed of the allegations. However, as per general safeguarding principles, this does not and will not stop us taking immediate action to safeguard our children, where required.

We will regularly review our decisions and actions, consider our relevant policies and any lessons learnt. We will look out for potential patterns of concerning, problematic or inappropriate behaviour. Where a pattern is identified, we will decide on a course of action. Consideration will be given to whether there are wider cultural issues within our setting that enabled the inappropriate behaviour to occur and where appropriate extra teaching time and/or staff training could be delivered to minimise the risk of it happening again.

The DSL (or deputy) will use their professional judgement to: (a) assess the nature and seriousness of the alleged behaviour, and (b) determine whether it is appropriate for the alleged behaviour to be to be dealt with internally and, if so, whether any external specialist support is required.

In borderline cases the DSL (or deputy) may consult with Family Connect, and/or other relevant agencies on a no-names basis (where possible) to determine the most appropriate response.

Where the DSL (or deputy) considers or suspects that the alleged behaviour in question might be abusive or violent on a spectrum or where the needs and circumstances of the individual child/children in question might otherwise require it, the DSL (or deputy) will contact Family Connect or the local social care team for the child and/or the police immediately and, in any event, within 24 hours of the DSL (or deputy) becoming aware of the alleged behaviour. The DSL (or deputy) will discuss the concern(s) or allegation(s) with the agency and agree on a course of action, which may include:

1. manage internally;
2. early help;
3. referral to children's social care; and
4. reporting to the police.

All concerns, discussions, decisions, and reasons for decisions will be recorded (written or electronic).

If bail conditions are in place, we will consider what additional measures may be necessary to manage any assessed risk of harm that may arise within our setting.

There may be delays in any case that is being progressed through the criminal justice system. We will not wait for the outcome (or even the start) of a police investigation before protecting the victim, alleged perpetrator(s) and other children and adult students in the school or college. The DSL (or a deputy) will work closely with the police (and other agencies as required), to ensure any actions we take do not jeopardise the police investigation.

If a child is convicted or receives a caution for a sexual offence, we will update our risk assessment. We understand it is important that we ensure both the victim and alleged perpetrator(s) remain protected. Where cases are classified as "no further action" (NFA'd) by the police or Crown Prosecution Service, or where there is a not guilty verdict, we will continue to offer support to the victim and the alleged perpetrator(s).

If a report is determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to Family Connect or the relevant children's social care team may be appropriate. If a report is shown to be deliberately invented or malicious, we will consider whether any disciplinary action is appropriate against the individual who made it as per our own behaviour policy.

Ongoing response to peer-on-peer abuse, including sexual violence or sexual harassment

We will consider the principles based on effective safeguarding practice and to help shape any decisions regarding safeguarding and supporting the victim and the alleged perpetrator(s).

Victims may not talk about the whole picture immediately. It is essential that dialogue is kept open and encouraged. We will offer victims a designated trusted adult in our setting to talk about their needs.

A victim of sexual violence is likely to be traumatised and, in some cases, may struggle in a normal classroom environment. We will avoid any action that would have the effect of isolating the victim, in particular from supportive peer groups, there may be times when the victim finds it difficult to maintain a full-time timetable and may express a wish to withdraw from lessons and activities. This will be because the victim wants to, not because it makes it easier to manage the situation. If required, we will provide a physical space for victims to withdraw.

Whilst we will give all the necessary support to victims to remain in our setting, if the trauma results in the victim being unable to do this, alternative provision or a move to another setting will be considered to enable them to continue to receive suitable education. This will only be at the request of the victim (and following discussion with their parents or carers).

Serious violence

All staff are aware of the indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

Staff are aware of the associated risks and understand the measures in place to manage these. We will follow the advice provided in the Home Office's Preventing youth violence and gang involvement and its Criminal exploitation of children and vulnerable adults: county lines guidance.

We recognise to help prevent violence in our setting this can require a mix of universal, targeted or specialist interventions. Our setting leaders will aim to:

- develop skills and knowledge to resolve conflict as part of the curriculum;
- challenge aggressive behaviour in ways that prevent the recurrence of such behaviour;
- understand risks for specific groups, including those that are gender-based, and target interventions;
- safeguard, and specifically organise child protection, when needed;
- carefully manage individual transitions between educational establishments, especially into Pupil Referral Units (PRUs) or alternative provision; and
- work with local partners to prevent anti-social behaviour or crime.

In order to tackle violence affecting our setting and the community, we know it is important to:

- understand the problems that young people are facing both in our setting and in their local community;
- consider possible avenues of support; and
- work with local partners (who may have valuable information, resources, or expertise).

Working with the local community safety partnership, the youth offending team and the neighbourhood police team will help us to achieve a full understanding of the context we are working in. As part of our emergency management planning, we have in place systems for targeting and responding to individual or group violence. Even if violent incidents themselves do not appear to be an immediate concern, there may be a need to build resilience to such problems for the future.

Evidence shows that early-stage intervention is an effective strategy for preventing children becoming involved in violence, crime or antisocial behaviour later in life. We will assess what will work best in preventing violence in our setting to decide who to involve in providing intervention.

Child abduction and community safety incidents

We recognise child abduction as the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends, and acquaintances); and by strangers.

We know that other community safety incidents in the vicinity of our setting can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

As children get older and are granted more independence (for example, as they start walking to school on their own) we will give them practical advice on how to keep themselves safe. This may include outdoor-safety lessons run by teachers or other professionals. We will aim to build on building children's confidence and abilities rather than simply warning them about all strangers.

Children and the court system

We recognise that sometimes children are required to give evidence in criminal courts, for crimes committed against them or for other crimes they have witnessed. We will follow the age appropriate guides to support children 5-11 year-olds and 12-17 year-olds.

We will follow these guides to ensure the correct process is followed and support and special measures are made available.

We understand that when child arrangements via the family courts are made following separation this can be a stressful and entrench conflict in families and this can be stressful for children. We will follow the guidance of the Ministry of Justice in managing these situations.

Children missing from education

Where children have gone missing, we will follow the West Mercia Pathway for Children who go Missing from Home, care or Education.

All staff are aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, including sexual abuse or exploitation and child criminal exploitation, including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, 'honour'-based abuse or risk of forced marriage. We will use early help strategies if necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. As part of induction, staff will be made aware of our unauthorised absence and children missing from education procedures.

Elective Home Education (EHE)

We understand that many home educated children have an overwhelmingly positive learning experience. We would expect that any parents' decision to home educate to be made with their child's best education at the heart of the decision. However, we know this is not the case for all, and home education can mean some children are less visible to the services that are there to keep them safe and supported in line with their needs.

From September 2016 the Education (Pupil Registration) (England) Regulations 2006 were amended. This means we inform Telford & Wrekin Council of all deletions from our admission register when a child is taken off roll.

Where a parent/carer has expressed their intention to remove a child from school with a view to educating at home, we will facilitate a meeting with the local authority education team, ourselves and other relevant schools, other key professionals and where possible parents/carers. Ideally, this will be before a final decision has been made, to ensure the parents/carers have considered what

is in the best interests of each child. This is particularly important where a child has SEND, is vulnerable, and/or has a social worker. The school will invite the local authority education team by emailing accessandinclusion@telford.gov.uk.

We understand it is our responsibility to identify parents or carers who we need to meet with to discuss EHE before they make their final decision. We will record if parents refuse to attend this meeting.

We will follow the Telford & Wrekin Council, EHE policy.

Children with family members in prison

We recognise that children who have a parent in prison are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. We will use the information from NICCO, to help mitigate negative consequences for those children.

Cybercrime

We understand cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include;

- unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded;
- denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources; and,
- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a child in this area, the DSL (or a deputy), will consider referring into the **Cyber Choices** programme.

Domestic abuse

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, children may blame themselves for the abuse or may have had to leave the family home as a result.

Young people can also experience domestic abuse within their own intimate relationships. This form of peer-on-peer abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child-safeguarding procedures should be followed and both young victims and young perpetrators should be offered support.

We will always liaise with agencies in a two-way process where domestic abuse is a factor in a household. Children within our care will be supported where needed. We are part of the Operation

ENCOMPASS process where domestic incidents are shared directly with us, so that we have an initial awareness. To this end, we will be part of any agency referral, in a two-way process, such as the Domestic Violence Multi-Agency Risk Assessment Conference (MARAC) and Multi Agency Public Protection Arrangements (MAPPA) or any other named agencies where these specific issues are a factor that may impair and impact on children's development.

Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked.

We will use the following additional advice on identifying children who are affected by domestic abuse and how they can be helped:

- NSPCC- UK domestic-abuse Signs Symptoms Effects
- Refuge what is domestic violence/effects of domestic violence on children
- SafeLives: young people and domestic abuse
- Domestic abuse: specialist sources of support - GOV.UK (www.gov.uk)
- Home : Operation Encompass

Homelessness

We understand that being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL (and any deputies) are aware of contact details and referral routes in to the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. As appropriate, we will make referrals and/or hold discussions with the Local Housing Authority. However, this does not, and will not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

We will consider homelessness in the context of children who live with their families, and intervention will be on that basis.

So-called 'honour-based' abuse (including Female Genital Mutilation and Forced Marriage)

We recognise that so-called 'honour-based' abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices, such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. We are aware of this dynamic and will consider additional risk factors when deciding what form of safeguarding action to take. We see all forms of HBA as abuse (regardless of the motivation) and will handle and escalate as such. We will ensure our community are alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

Actions

If staff have a concern regarding a child that might be at risk of HBA or who has suffered from HBA, they should speak to the DSL (or deputy). As appropriate, they will activate the local safeguarding procedures by contacting Family Connect/local social care team for the child and if necessary, the police.

FGM

We understand that FGM comprises of all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

We will follow the National FGM Centre Female Genital Mutilation: Guidance for schools.

FGM mandatory reporting duty for teachers

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon **teachers** along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should **not** be examining pupils or students, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies. Information on when and how to make a report can be found at Mandatory reporting of female genital mutilation procedural information.

Teachers **must** personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has good reason not to, they should still consider and discuss any such case with our DSL (or deputy) and involve children's social care as appropriate. The duty does not apply in relation to those at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers will follow our local safeguarding procedures and report to Family Connect or the local social care team for the child. The following is a useful summary of the FGM mandatory reporting duty: FGM Fact Sheet.

In respect of FGM we will adopt the local FGM Practice Guidelines and Resource Pack as part of safeguarding responsibilities and inform/educate our staff in this particular area.

Forced marriage

We understand that forcing a person into a marriage is a crime in England and Wales. We know that a forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices as a way to coerce a person into marriage. We play an important role in safeguarding children from forced marriage.

We will follow the Forced Marriage Unit published statutory guidance and Multi-agency guidelines. Our staff can contact the Forced Marriage Unit if they need advice or information, contact: 020 7008 0151 or email fmu@fco.gov.uk

Preventing radicalisation

We understand children are vulnerable to extremist ideology and radicalisation. Similar to our role in protecting children from other forms of harms and abuse, we will also protect children from this risk as part of our safeguarding approach.

- **Extremism** is the vocal or active opposition to our fundamental British values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- **Terrorism** is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat **must** be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious, or ideological cause.

We accept that there is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences, such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home).

We understand it is, where possible, our role to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, through appropriate training staff will be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff will use their judgement in identifying children who might be at risk of radicalisation and act proportionately which must include reporting their concerns to the DSL (or deputy) who will consider making a Prevent referral.

The Prevent duty

We are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of our functions, to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty.

We see The Prevent duty as part of our wider safeguarding obligation. Our DSL and deputies and other senior leaders are familiar with the revised Prevent duty guidance: for England and Wales, especially paragraphs 57-76.

As a college/sixth form we will follow the additional guidance: Prevent duty guidance: for further education institutions in England and Wales that applies to colleges.

We will follow the published advice for schools on the Prevent duty.

We aim to ensure all staff have completed training on the Prevent duty.

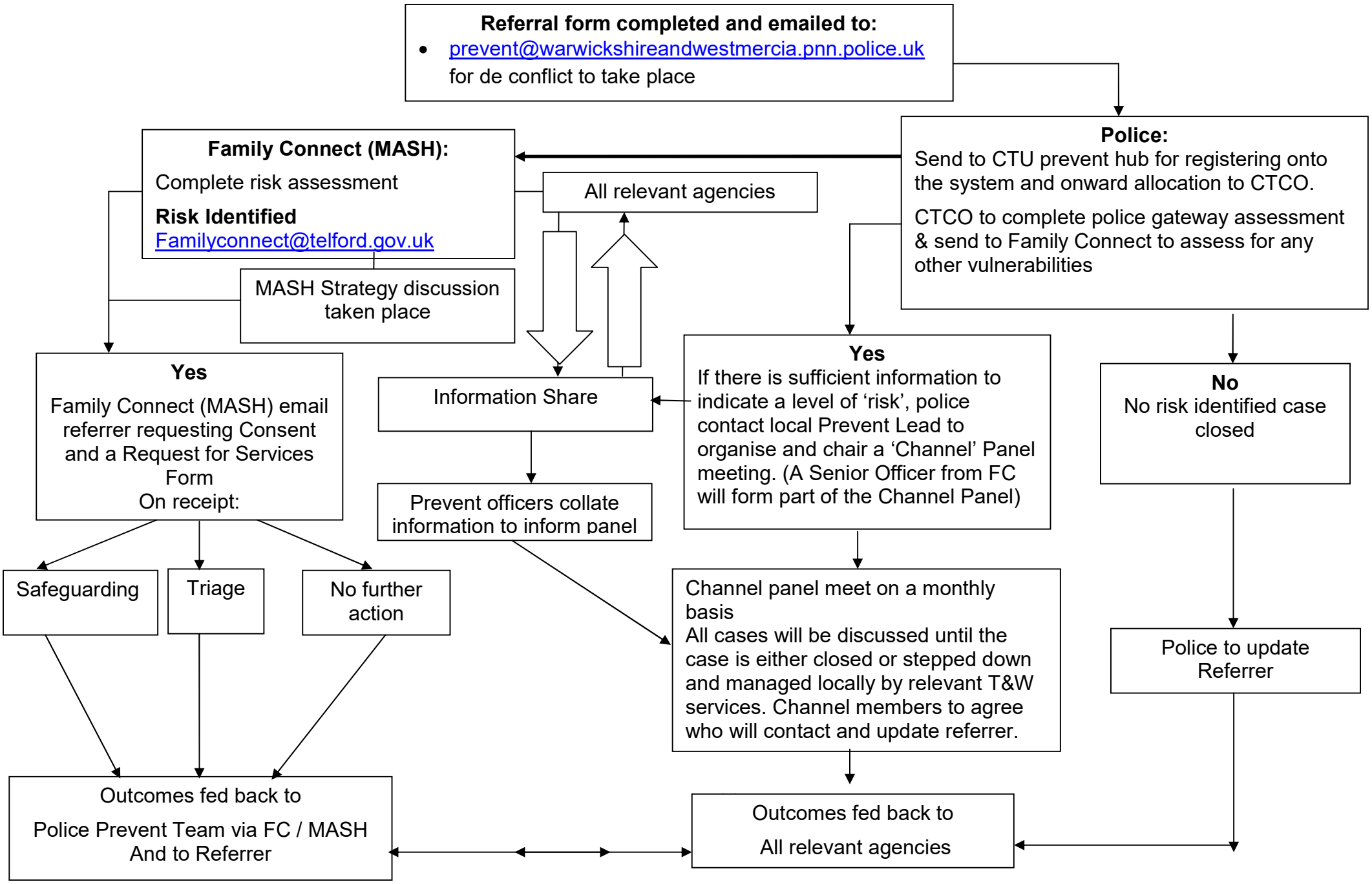
Channel

Channel is voluntary, as a confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. We will refer to the relevant Channel programme if we are concerned that an individual might be vulnerable to radicalisation. We will always seek the individual's consent to do so. We will attend and engage with the Channel panel to assist in any assessment.

We will follow the Channel guidance.

If we feel children are being abused through extremism or being radicalised, we will consult directly with the local police Counter Terrorism Unit (CTU). This is done with a Prevent referral form, following the Prevent flowchart. The referral will be sent to the police. As with all referrals, this referral will be dealt with appropriately with professionals. If it is deemed from the Prevent team that the intervention is not criminal and does not warrant a Channel Panel, but needs local support, we will work with those professional leads for Telford & Wrekin Council. Presently that is **Jas Bedesha,** jas.bedesha@telford.gov.uk. The education lead for Telford & Wrekin Council is **Scott Thomas-White**, scott.thomaswhite@telford.gov.uk. Where necessary, the DSL (or deputy) will consult with the Telford and Wrekin professional lead, education lead or CTU officer: Alison Potts, a.potts@west-midlands.pnn.police.uk, 07391019552, to seek advice on making prevent referrals.

Telford & Wrekin Prevent Pathway

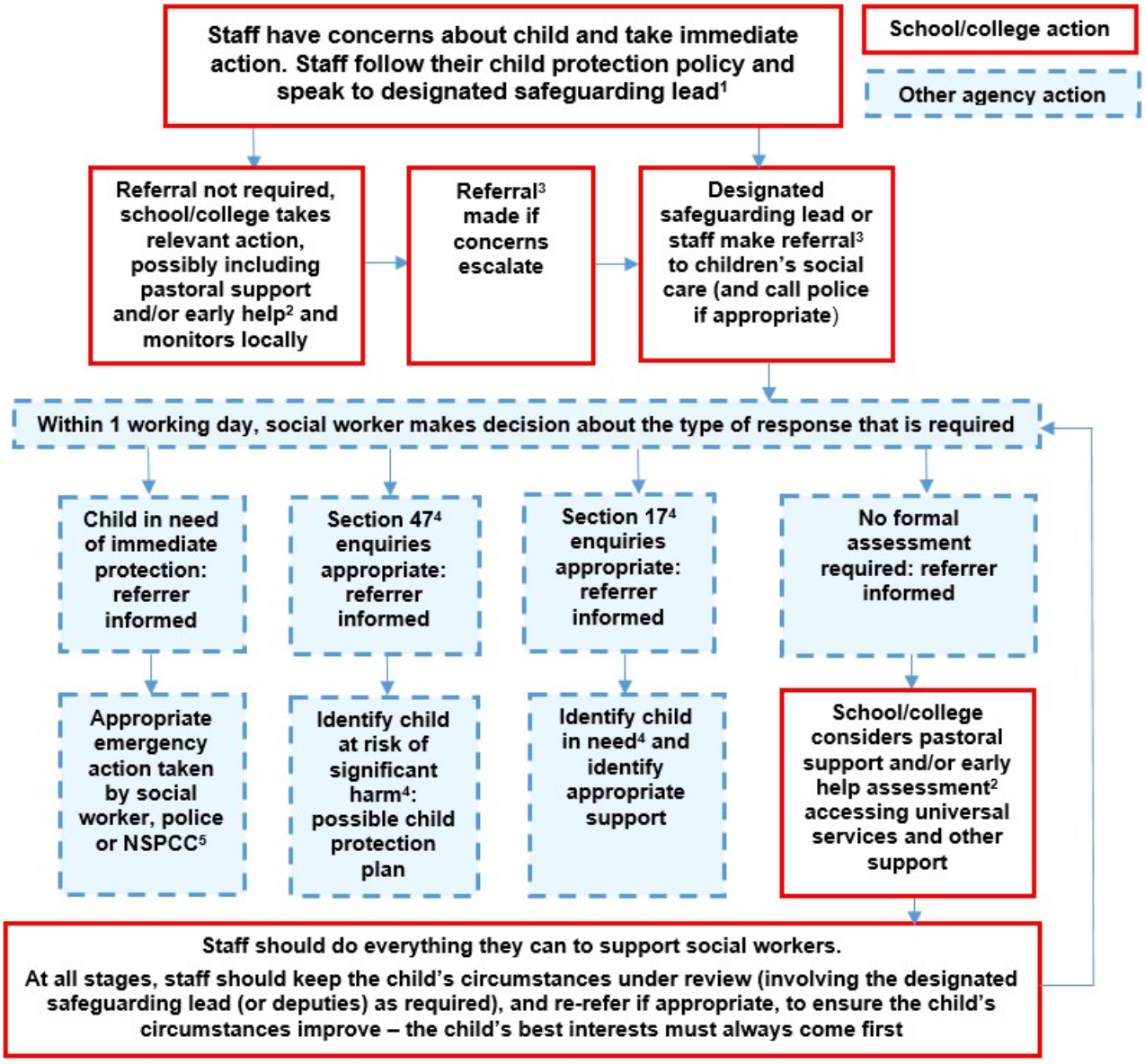


- Family Connect (MASH) will discuss with Police HAU to support the completion of a risk assessment at the earliest opportunity
- If referral is adult led and children are identified being present / resident within the family home, the referral form will be shared with Family Connect along with all supporting evidence
- Safeguarding, Triage and No further action are key outcomes following the completion of ‘Request for services’ form
- Agreed outcomes will shared between Family connect and Police.

What to do if you have concerns about a child

Staff working in our setting maintain the attitude of **'it could happen here'** where safeguarding is concerned and will always act in the **best** interests of the child.

If staff have any **concerns** about a child's welfare, they must act on them **immediately**. The following flow chart sets out the process for staff when they have concerns about a child.



Where someone has a concern about the welfare of a child, they should speak to the DSL (or deputy). Options will then include;

- managing any support for the child internally via our own pastoral support processes;
- undertaking an early help assessment; or
- making a referral to statutory services, for example, as the child is in need or suffering or likely to suffer significant harm. This will involve contacting Family Connect or the local social care team for the child.

NPCC- When to call the police will be considered by the DSL to help them understand when they should consider calling the police and what to expect when they do.

All referrals to the local social team must be followed up in writing using the social care team's relevant referral/request forms. For referrals in Telford & Wrekin we will use the Request for service form.

If in exceptional circumstances, the DSL or a deputy is not available, the person who has the concern should speak to a member of the senior leadership team and/or take advice from Family Connect or the local social care team for the child. In these circumstances, any action taken should be shared with the DSL (or deputy) as soon as is practically possible.

Staff should not assume a colleague, or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision. Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers supports staff who have to make decisions about sharing information. If in any doubt about sharing information, staff should speak to the DSL or a deputy.

Referral agencies

Telford & Wrekin social care team	Shropshire social care team	Staffordshire social care team	Wolverhampton social care team
Family Connect 01952 385385 Out of Hours 01952 676500	First Point of Contact 0345 678 9021 Out of Hours 0345 678 9040	First Response 0800 1313 126 Out of Hours 0345 604 2886	Safeguarding Together 01902 555392 Out of Hours 01902 552999
If you think a child is in immediate danger, **call the police on 999**			
Childline 0800 1111	NSPCC 0800 800 5000	Protecting Vulnerable People (West Mercia Police): 101	

Immediate response to a child or parent

Staff will follow effective safeguarding practice which includes:

- if possible, managing reports with two members of staff present, (preferably one of them being the designated safeguarding lead or a deputy). However, this might not always be possible;
- where the report includes an online element, we will be aware of searching, screening and confiscation advice (for schools) and UKCCIS sexting advice (for schools and colleges). The key consideration is for staff not to view or forward illegal images of a child. The highlighted advice provides more details on what to do when viewing an image is unavoidable. In some cases, it may be more appropriate to confiscate any devices to preserve any evidence and hand them to the police for inspection;
- not promising confidentiality at this initial stage as it is very likely a concern will have to be shared further (for example, with the DSL or children's social care) to discuss next steps. Staff will only share the report with those people who are necessary in order to progress it. It is important that the victim understands what the next steps will be and who the report will be passed to;
- recognising a child is likely to disclose to someone they trust: this could be **anyone** staff in our setting. It is important that the person to whom the child discloses recognises that the child has placed them in a position of trust. They should be supportive and respectful of the child;
- keeping in mind that certain children may face additional barriers to telling someone because of their vulnerability, disability, sex, ethnicity and/or sexual orientation;
- listening carefully to the child, reflecting back, using the child's language, being non-judgmental, being clear about boundaries and how the report will be progressed, not asking leading questions and only prompting the child where necessary with open questions – where, when, what, etc or TED 'tell me', 'explain to me' and 'describe'. It is important to note that whilst leading questions should be avoided, staff can ask children if they have been harmed and what the nature of that harm was;

- considering the best way to make a record of the report. Best practice is to wait until the end of the report and immediately write up a thorough summary. This allows the staff member to devote their full attention to the child and to listen to what they are saying. It may be appropriate to make notes during the report (especially if a second member of staff is present). However, if making notes, staff should be conscious of the need to remain engaged with the child and not appear distracted by the note taking. Either way, **it is essential a written record is made**;
- only recording the facts as the child presents them. The notes should not reflect the personal opinion of the note taker. We are aware that notes of such reports could become part of a statutory assessment by children's social care and/or part of a criminal investigation; and
- informing the DSL (or deputy), as soon as practically possible, if the DSL (or deputy) is not involved in the initial report.

If conversations need to take place and confidentiality is paramount to welfare, then these conversations will be held in appropriate settings and away from any general areas, where that confidentiality may be compromised.

We will never allow fears about sharing information to stand in the way of the need to promote the welfare and protect the safety of children. We expect **concerns that arise in a morning will be reported to the DSL (or deputies) by lunchtime that day**. **Concerns that arise in an afternoon should be reported by or as close to the end of the Madeley nursery day, or as soon as reasonably practicable**. Any concerns arising outside of the normal Madeley Nursery day should be reported as quickly as possible. If in doubt concerned, parties should talk with the DSL (or deputy). **Delay is unacceptable and may result in disciplinary action**.

Where a child is suffering, or is likely to suffer from harm, we will make a referral to children's social care (and if appropriate the police) immediately. If we are unsure which local authority the child, lives in with use the online tool Report Child Abuse to Your Local Council to direct us to the relevant local children's social care contact number.

Children's social care assessments should consider where children are being harmed in contexts outside the home. Therefore, we will provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and enable a contextual approach to address such harm.

Our role is to refer the information received and **under no circumstances** become the investigator.

We will work appropriately with each child, their family and other agencies to protect in all cases the welfare of the child. We will work in partnership and fulfil the ethos and abide by the principles of the Telford and Wrekin threshold guidance or the threshold guidance for the local social care team for the child.

Staff working at this setting may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead professional. Any such cases will be kept under constant review and consideration given to a referral to children's social care assessment for statutory services if the child's situation does not appear to be improving or is getting worse.

Staff working at this setting will be made aware of the process for making referrals to children's social care and statutory assessments. This is under the Children Act 1989, especially **section 17 (children in need)** and **section 47 (a child suffering, or likely to suffer, significant harm),** that may follow a referral; along with the role staff might be expected to play in such assessments.

A **child in need** is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Local authorities are required to provide services for children in need for the purposes of

safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989.

Local authorities, with the help of other organisations as appropriate, have a duty to make enquiries under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a **child is suffering, or is likely to suffer, significant harm**. Such enquiries enable them to decide whether they should take any action to safeguard and promote the child's welfare and must be initiated where there are concerns about maltreatment, including all forms of abuse and neglect, female genital mutilation or other so-called honour-based violence, and extra-familial threats like radicalisation and sexual exploitation.

Where there are visible injuries, all staff should record these on a body map diagram and describe them the best they can. We will assume good evidential practice to get two persons involved who have seen the injury and can account for it on the body map, then immediately follow up with a referral as described above.

Under **no** circumstances will staff photograph injuries seen on children. Our staff are not expert witnesses. If the concern is around non-accidental injury, then that is a matter that requires immediate attention on the day resulting in an appropriate referral to Family Connect or the local social care team for the child. Those professionals will control the process of photographic evidence gathering underway and assessment.

For staff to interpret any concerns we will assess each incident as it appears. In respect of assessing any bruising to a child we will refer to the Bruising of Children guidance produced by the TWSP to assist their decision making.

The role of the local authority

Within one working day of a referral being made, a local authority social worker should acknowledge receipt to us as the referrer and make a decision about the next steps and the type of response that is required. This will include determining whether:

- the child requires immediate protection and urgent action is required;
- any services are required by the child and family and what type of services;
- the child is in need, and should be assessed under section 17 of the Children Act 1989;
- there is reasonable cause to suspect the child is suffering or likely to suffer significant harm, and whether enquiries must be made, and the child assessed under section 47 of the Children Act 1989; and
- further specialist assessments are required to help the local authority to decide what further action to take.

The referrer will, even if they are not the DSL (or deputy), follow up if this information if it is not forthcoming.

If, after a referral, the child's situation does not appear to be improving, we will consider following TWSP local escalation procedures or those for the safeguarding partnership for the child to ensure our concerns have been addressed and, most importantly, that the child's situation improves.

The Telford & Wrekin Council Director of Children's Services is **Jo Britton**.

Record keeping

All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing using our electronic recording system. Information will be kept confidential and stored securely. We will keep concerns and referrals in a separate child protection file for each child.

Records should include:

- a clear and comprehensive summary of the concern;
- details of how the concern was followed up and resolved; and

- a note of any action taken, decisions reached and the outcome.

If in doubt about recording requirements, staff will discuss with DSL (or deputy).

Anyone who has a safeguarding concern should follow these recording principles:

- record the date, time, place and context of the concern, recording facts and who you shared them with;
- record where you spoke with the child or parent and personal safety details, such as 'I discussed the incident with the child in the Headteacher's office with the door open' or justify if it were closed but naming those who you told this to be the case. If alone, reason that rationale stating, 'the child stated they would only confide in me if I was alone'.
- if it is observation of bruising or an injury try to record detail, e.g., 'right arm, above elbow', 'bruise approximately 5cm in diameter noticed on back of lower right leg';
- note the non-verbal behaviour and the key words in the language used by the child or parent (try not to translate into 'proper terms' ensuring that you use the child or parent's own words). Body language should be noted and support any record of disclosure; and
- it is important to retain on file signed original handwritten notes and pass them on to the DSL (or deputy) who may ask you to complete a written referral to children's social care.

We adopt guidance from TWSP Workbook for Designated Safeguarding Leads and Governors/Committee with responsibility for safeguarding, incorporating: Advice note on Child Protection record keeping.

We note down concerns on a yellow Cause for Concern form. Concerns are stored chronologically in a safeguarding file/electronically for that child.

Madeley Nursery has adopted an electronically maintained recording system called Scholarpack. The Scholarpack system is a totally secure system of record keeping which enables us to quickly encapsulate a child journey with us. We will ensure that a restricted number of staff will have full access to this system as named key holders –DSL'S. If concerns have been logged by staff via this process it should not be presumed that this is an instant notification that has been seen immediately. If appropriate the issue should not assume anything and a verbal conversation should also take place if needed for clarification.

What to do if you have safeguarding concerns about another staff member

If staff have safeguarding concerns, or an allegation is made about another member of staff (including supply staff, volunteers and contractors) posing a risk of harm to children, then:

- this should be referred to the Headteacher and Deputy;
- where there are concerns/allegations about the Headteacher/Deputy, this should be referred to the chair of governors;

Any allegations that may meet the harms threshold will be addressed as set out in Part four, Section one of KCSIE. Any concerns that do not meet the harm threshold, referred to, as 'low level concerns' will be addressed as in Part four, Section two of KCSIE. When an allegation is made, the DSL will be responsible for ensuring that a child is not at risk and refer cases of suspected abuse to Family Connect or the child's local social care team.

We will **only** undertake basic enquiries to help determine whether is any foundation to the allegation.

The LADO for Telford & Wrekin Council is Tutsi Selvey who will be informed of all allegations that come to our attention and appear to the meet the criteria set out in part four, section one of KCSIE, so she can consult police and children's social care services as appropriate. All LADO referrals must be made via Family Connect.

We will make a referral to the Disclosure and Barring Service (DBS) if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned.

We believe that those who work within our community are in positions of trust and as such codes of conduct are based on the underlying principle that the highest standards are expected from all. In line with KCSIE a separate code of conduct policy will be adopted by this setting for staff, volunteers, contractors and governors.

Guidance for safer working practice for those working with children and young people in educational settings produced by the Safer Recruitment Consortium, provides excellent guidance on the expected standards of all those that work with children. We will make all those in our community aware of its existence and this will work alongside the separate code of conduct mentioned above and any established human resources processes currently in place.

To help avoid potential allegations and safeguarding concerns, and for the safety and welfare of pupils and the protection of staff, we will make classrooms highly visible places whereby easy viewing is possible. The masking of windows is forbidden and as such treated as a safeguarding issue for the protection of all. There may be exceptional circumstances where masking of classrooms is needed and justified, for example, for the teaching of drama; in these cases, the Headteacher will make a judgement on a case-by-case basis being appropriate, balanced, and proportionate.

Please see our procedure for managing safeguarding concerns, or allegations against staff (including supply staff, volunteers and contractors).

What to do if you are concerned about another safeguarding practice in Madeley Nursery

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in our safeguarding regime and know that such concerns will be taken seriously by our senior leadership team.

Please refer to our Whistleblowing procedures.

Where staff feel that they cannot report a concern through the above channels general guidance can be found at Advice on whistleblowing. The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285 or email help@nspcc.org.uk

Part two: The management of safeguarding

The **designated governor** with responsibility for safeguarding is (tbd at Governors Oct 7th). They have a strategic leadership responsibility for our safeguarding arrangements and must ensure that we comply with their duties under legislation. They must have regard to KCSIE, ensuring our policies, procedures and training in our setting are effective and comply with the law at all times. They have attended TWSP safeguarding governor training. All governors have completed child protection and safeguarding training.

Our Headteacher will ensure that the policies and procedures, adopted by this governing body/proprietor, are understood, and followed by all staff.

Our approach to safeguarding

This governing body will ensure that we facilitate a whole setting approach to safeguarding. This means ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and our policy development. Ultimately, all systems, processes and policies will operate with the best interests of the child at their heart.

Where there is a safeguarding concern, our governing body and our senior leaders will ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide. Systems are in place, and they will be well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.

We will facilitate staff to contribute to and shape our safeguarding arrangements and Child Protection policy.

We will ensure that suitable arrangements are in place to provide access for all staff to access safeguarding supervision. Please see our Safeguarding Supervision policy.

Policies and procedures

We aim to ensure there are appropriate policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare.

Missing from education

The recognised figure for persistent absence is being less than 90%, although concerns may still be raised if above this. We will comply with the statutory guidance Children Missing Education. In respect of this and at a local level, we will require the behaviour and attendance lead to refer to and use the established protocol document of notification to the Local Authority, filling out the appropriate paperwork, policies and procedures for identifying pupils who are missing out on education and policies and procedures for pupils on a modified timetable (available from Telford & Wrekin Council, Access & Inclusion Team). In addition to the above and where reasonably possible we will endeavour to hold more than one emergency contact number for each pupil. This goes beyond the legal minimum and is good practice to give us additional options to make contact with a responsible adult when a child is missing education and poses a potential welfare/safeguarding concern. Where a child is on a Child Protection Plan has been missing from school for two consecutive days, we will notify the child's allocated social worker.

Where children leave the classroom or leave our grounds without permission, this is covered within our behaviour management policy and is also set against the backdrop of the legal framework of the Children Act 1989 s3 (5); 'Anyone who has care of a child without parental responsibility may do what is "*reasonable"* in all the circumstances to safeguard and promote the child's welfare. It is likely to be "*reasonable"* to inform the police, or children's services departments, and, if appropriate, their parents, of the child/young person's safety and whereabouts'. However, in principle, if a pupil runs out of class we will establish where he or she has gone. Staff will not run

after them but will seek additional support. It is advisable to keep a watchful eye on any children who has taken themselves out of our building and possibly out of our grounds unless this watchful eye provokes the child to run further. It is and will be a judgement call for staff to take what they feel is **reasonable** action in line with the advice above. If a child is no longer on the premises, we will contact parents in the first instance. If they are not contactable, we will inform the police that a pupil has left and is at risk.

The designated safeguarding lead (DSL)

Our governing body has appointed Louise Lowings to be the DSL of Madeley Nursery; Helen Torr and Victoria Waring to be the deputies. We will set out their responsibilities in their job descriptions.

Louise Lowings will take ultimate responsibility for safeguarding and child protection, and online safety at our setting as the DSL as an appropriate **senior member** of staff from our **leadership team**.

During term time, the DSL and/or a deputy will always be available (during our normal operating hours) for the staff to discuss any safeguarding concerns with. During out of hours/out of term activities we will provide appropriate cover by ensuring the DSL and/or a deputy is available.

Prior to any education visit, a risk assessment will be completed to consider if the DSL (or a deputy) needs to be present. We will always consider how quickly a DSL can respond to a safeguarding issue if they are not present. Where safeguarding concerns are raised during an educational visit the DSL (or deputy) must be notified immediately, even if they are not physically present at the site of the educational visit. They will liaise with the person responsible for the education visit to manage the concern and refer to the relevant agencies.

The DSL and any deputies will undergo two-day 'newly appointed designated safeguarding lead' training as recognised by TWSP to provide them with the knowledge and skills required to carry out the role. They will attend one-day 'designated safeguard lead refresher training' as recognised by TWSP every two years. In addition to their formal training as set out above, their knowledge and skills will be updated, for example, via Telford & Wrekin Council's Education Safeguarding e-bulletins, attending termly designated safeguarding lead refreshers and taking time to read and digest safeguarding developments, at regular intervals, and at least annually, to keep up with any developments relevant to their role. We aim to ensure at least one DSL and any deputies attend each termly update. All designated safeguarding leads and any deputies will disseminate training to all relevant staff and governors.

The designated safeguarding lead will form part of a borough wide network, where information is shared, in a two-way process, with the Telford & Wrekin Council, Education Safeguarding Team.

They will complete the Safeguarding Audit - Education each year and submit to TWSP. The Safeguarding Audit – Education, will be supplied by the Telford & Wrekin Council Education Safeguarding Team.

The DSL and their deputies will fulfil their role and responsibilities as set out in Annex C KCSIE.

Multi-agency working

The DSL and any deputies will work with other agencies in line with Working Together to Safeguard Children.

Our governing body and the DSL are familiar with the TWSP arrangements. In Telford & Wrekin schools and colleges have been named as relevant agencies by the TWSP. We will engage with the TWSP as required and follow the Telford & Wrekin Threshold Guidance or the appropriate threshold guidance for where the child resides or for who is responsible for the child, to follow the local protocol for assessments.

The governing body of this setting expect staff to work with social care, the police, health services and other services to promote the welfare of children and protect them from harm. This includes us providing a coordinated offer of early help when additional needs are identified by us or another agency. We will never restrict access for children's social care to conduct a section 17 or section 47 assessment.

Information sharing

We recognise that information is vital in identifying and tackling all forms of abuse and neglect, and in promoting children's welfare, including their educational outcomes. Schools and colleges have clear powers to share, hold and use information for these purposes.

We expect all staff to share information with practitioners and local agencies. We are committed to sharing information as early as possible to help identify, assess, and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a child is already known to the local authority children's social care.

All child protection records are clearly marked as such and are kept securely locked on the premises and on Scholarpack, the nominated persons are responsible, accountable, documented and are identifiable within our setting for total security. Also, procedures are in place when a member of staff leaves the setting or is on long term sick leave for their access to cease. Withdrawal of child protection records from our setting by staff will be noted and signed for, as will files released to professionals.

The child protection file is a separate file to the educational records. It must be noted that if files are asked to be secured, both files are key elements in any processes for which they are needed. It is important that on releasing files they are signed for on release and on return.

Pupil record files must be kept until the individual reaches the age of 25 years or in certain circumstances later. At this point the file should be disposed of confidently.

In respect of files being released when requested by the Police under Section 29 of the Data Protection Act 2018 a form entitled 'Request to external organisation for the disclosure of personal data to the police-Under Schedule 2 Part 1 Paragraph 2 of the Data Protection Act 2018 and GDPR Article 6(1))d)' should accompany that release and a copy will be retained for our records. Madeley Nursery will also seek advice and adopt the Information sharing advice for safeguarding practitioners. If in any doubt we will seek advice from our **Data Protection Officer.** Upon releasing records Madeley Nursery will request ID Badges for release. If the Police are only after minimal data e.g. address or phone number, we will ensure we check the police ID and we will record what information was asked for and the name of the police officer requesting it. A permission form may not be required on these occasions.

No named statistics in relation to child protection are an important part of performance information. These may be shared by the DSL with staff, other agencies, or the governing body/proprietor/management committee.

In our management of information sharing we will use the following:

- Chapter one of Working Together to Safeguard Children, which includes a myth-busting guide to information sharing;
- Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers. The seven golden rules for sharing information will be especially useful;
- The Information Commissioner's Office (ICO), which includes ICO GDPR FAQs and guidance from the department; and
- Data protection: toolkit for schools - Guidance to support schools with data protection activity, including compliance with the GDPR.

When a child leaves Madeley Nursery, the DSL will ensure their child protection file is transferred to the new school or college as soon as possible (within five working days of the child starting at

their new school or college), ensuring secure transit, and confirmation of receipt will be obtained. We will transfer the child protection file separately from the main pupil file. As a receiving nursery school we will ensure key staff such as DSL's and SENDCO's, are aware as required. In addition to the child protection file, the DSL will also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. If we are the current host school we will **not** photocopy and retain child protection records. This is deemed from the Information Commissioners Office that this would contravene The Data Protection Act 2018, but rather produce a chronology to pass on with the child protection records and retain a copy of this chronology for themselves for audit purposes, this would be deemed as best practice.

All child protection records are reviewed annually in the summer term by the DSL (or deputy) and checked to be chronological, tidy, legible and factual in content. This should be undertaken each year, as records may sometimes be immediately required by professionals. Where reports are needed for child protection and safeguarding meetings, these should include attendance figures.

Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare of children.

We will follow the guidance on the child protection file set out in Annex C KCSIE.

Opportunities to teach safeguarding

We will teach safeguarding, including online safety. We endeavour to provide a more personalised or contextualised approach for more vulnerable children, victims of abuse and some SEND children. We will do this through our Relationships Education and Education/Heath Education.

We will ensure that appropriate filters and monitoring systems that are in place, does not lead to unreasonable restrictions as to what children can be taught with regard to online teaching and safeguarding.

Online safety

We recognise online safety is a major concern for all professionals'. For information and support, staff will refer to the 'information and support' section of Annex D: Online safety KCSIE.

We believe it is essential that children are safeguarded from potentially harmful and inappropriate online material. We will take an effective whole setting approach to online safety to empower us to protect and educate our pupils, students, and staff in their use of technology.

The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

- **content:** being exposed to illegal, inappropriate, or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
- **contact:** being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes'.
- **conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and
- **commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams. If we feel our pupils, students or staff are at risk, we will report it to the Anti-Phishing Working Group (https://apwg.org/).

We will ensure online safety is a running and interrelated theme whilst devising and implementing policies and procedures. This will include considering how online safety is reflected as required in

all relevant policies and considering online safety whilst planning the curriculum, any teacher training, the role and responsibilities of the DSL and any parental engagement.

We take seriously our duties to assist parents and help them with online safeguarding resources. As such, we will make them aware of relevant support services, including those listed on pages 151-152 of KCSIE 2021.

We accept that many children have unlimited and unrestricted access to the internet via mobile phone networks. This access means some children, whilst in our setting, sexually harass their peers via their mobile and smart technology, share indecent images: consensually and non-consensually, view, share pornography, and other harmful content. Our management of this in included in our mobile and smart technology policy. These incidents will be managed in line with our peer-on-peer procedures.

Where children are being asked to learn online at home we will follow the advice to support schools and colleges do so safely: safeguarding in schools colleges and other providers and safeguarding and remote education. We recognise the NSPCC and PSHE Association also provide helpful advice.

Whilst considering our responsibility to safeguard and promote the welfare of children and provide them with a safe environment in which to learn, we will do all that we reasonably can to limit children's exposure to risks from our IT system. We will ensure we have appropriate filters and monitoring systems in place. We will do this by considering the age range of our children, the number of children, how often they access the IT system and the proportionality of costs versus risks.

The appropriateness of our filters and monitoring systems have been informed in part, by the risk assessment required by the Prevent Duty.

We have the appropriate level of security protection in place, in order to safeguard our systems, staff and learners and we will review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies.

We will carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks their children face.

Our governing body will question school leaders to gain a basic understanding of our approach to keeping children safe online; learn how to improve this approach where appropriate; and find out about tools, which can be used to improve the approach.

Mentors of trainee teachers and newly qualified teachers induct mentees and provide ongoing support, development and monitoring on online safety.

As a maintained nursery school we adhere to The Corporate Information Security Policy (CISP) including Acceptable Use of Equipment and the Social Media Policy-Acceptable Use for Employees. We will make all aware of its existence and importance. Where appropriate, intervention will take place when anyone uses e-technology in an unacceptable fashion.

Please see our policy on the safe use of mobile and smart technology in the school.

Safe use of electronic devices

We will ensure the safety and welfare of our children in our care. All personal electronic devices are not permitted within this setting, when in the presence of children.

Please see our policy on the use of electronic devices.

Inspection

We recognise our responsibilities for safeguarding within the remit of Ofsted.

The use of 'reasonable force'

There are circumstances when it is appropriate for staff in our setting to use reasonable force to safeguard children and young people. The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means us 'using no more than is needed'. Our use of force my involve either passive physical contact, such as standing between pupils or blocking a pupil's path, or active physical contact such as leading a pupil by the arm out of the classroom.

We will always follow the advice for schools on the Use of Reasonable Force in Schools. We will also have regard to additional guidance Reducing the Need for Restraint and Restrictive Intervention for children and young people with learning disabilities, autistic spectrum conditions and mental health difficulties in health and social care services and special education settings.

We believe that the adoption of a 'no contact' policy in our setting could leave staff unable to fully support and protect our pupils and students. We will adopt a sensible approach allowing staff to make appropriate physical contact. The decision on whether to or not to use reasonable force to control or restrain a child is down to the professional judgement of the staff concerned and should always depend on individual circumstances.

When using reasonable force in response to risks presented by incidents involving children with SEND, mental health or with medical conditions, we will consider the risks carefully because we recognise the additional vulnerability of these groups. We will consider our duties under the Equality Act 2010 in relation to making reasonable adjustments, non-discrimination and our Public Sector Equality Duty.

We will plan positive and proactive behaviour support, for instance through drawing up individual behaviour plans for more vulnerable children, and agreeing them with parents and carers, we aim to reduce the occurrence of challenging behaviour and the need to use reasonable force. We will only use reasonable force where de-escalation processes have failed.

Hiring out our facilities and premises

Where we hire or rent out our facilities/premises to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities) we will ensure that appropriate arrangements are in place to keep children safe.

When services or activities are provided by us, under our own direct supervision or management, our own arrangements for child protection will apply. However, where services or activities are provided separately by another body this is not necessarily the case. We will therefore seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place including inspecting these; and ensure that there are arrangements in place to liaise with us on these matters where appropriate. We will also ensure safeguarding requirements are included in any transfer of control agreement (i.e., lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this may lead to termination of the agreement.

Children who need a social worker (Child in Need and Child Protection Plans)

Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect and complex family circumstances. A child's experiences of adversity

and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health.

Local authorities should share the fact a child has a social worker, and the DSL will hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes.

Where children need a social worker, this information will be used by the DSL (or deputies) to inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

Children requiring mental health support

We recognise that we have an important role to play in supporting the mental health and wellbeing of our pupils.

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. The governing body/board/proprietor have put clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems.

We will help prevent mental health problems by promoting resilience as part of our integrated, whole setting approach to social and emotional wellbeing, which is tailored to the needs of our pupils.

Our senior mental health lead is Paula England. They are a member of our senior leadership team. The appointed member of our senior leadership team who supports our senior mental health lead is Louise Lowings.

Please see our mental health and well-being policy.

Suicide Intervention

We accept and understand that thoughts of suicide are common and the leading cause of death in young people. As such, suicide intervention is our business too. We to work with our pupils and work in partnership to support anyone in our community that may have thoughts of suicide. We will follow our Suicide Intervention Policy to assist wherever we can in making those in our care as safe as is possible. We will also make staff aware of the following useful link in raising awareness of the subject http://zerosuicidealliance.com/

Looked after children and previously looked after children

We recognise that the most common reason for children becoming looked after is as a result of abuse and/or neglect. All staff at our setting have the knowledge and skills to keep looked after children safe. The DSL will hold the details of each child's social worker and the name of the virtual school head in the authority that looks after the child. They are responsible for ensuring all staff have the information they need in relation to a child's looked after status and the child's contact arrangements with birth parents of those with parental responsibility. They will also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her.

We recognise a previously looked after child potentially remains vulnerable.

When dealing with looked after children and previously looked after children we will work with all agencies to take prompt action where necessary to safeguard these children.

The designated teacher

The governing body appoint **Louise Lowings as the designated teacher** to work with the local authorities to promote the educational achievement of registered pupils who are looked after. With the commencement of sections 4 to 6 of the Children and Social Work Act 2017, designated teachers have responsibility for promoting the educational achievement of children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales. The designated teacher has appropriate training and relevant qualifications and experiences to fulfil this role.

We will follow the statutory guidance on The Roles and Responsibilities of the Designated Teacher.

Virtual school heads

As a maintained school, the designated teacher should work with the virtual school head to discuss how funding can be best used to support the progress of looked after children in the school and meet the needs identified in the child's personal education plan. The designated teacher also works with the virtual school head to promote the educational achievement of previously looked after children.

We will follow the statutory guidance on Promoting the Education of Looked After Children.

Children who have special educational needs and disabilities (SEND) or physical health issues

We recognise that children who have SEND or certain health conditions can face additional safeguarding challenges. We accept the additional barriers that can exist when recognising abuse and neglect of children in this group of children. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- being more prone to peer group isolation than other children;
- the potential for children with SEND being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these barriers.

To help address these additional challenges we will provide extra pastoral support for children with SEND.

Staff

All staff, supply staff, contractors, and visitors, are informed of the name of the DSL and deputies and our procedures for protecting children, for example, how to report their concerns, suspicions and how to receive, record and report disclosures.

Staff should not accept personal invitation visits to the homes of children unless permission or instruction has been sought from the Headteacher and it is viewed as a professional appointment, for example, supporting education welfare issues etc. This should be viewed on a case-by-case basis. To support this, guidance from the Department of Education (September 2010) states 'Meetings with pupils away from the school premises should only be arranged with the specified approval of the head teacher and the prior permission of the pupil in question'. We accept this guidance from the Department of Education (September 2010) stating that in the case of private meetings; 'Staff and volunteers should be aware that private meetings with individual pupils could give cause for concern. There will be occasions when a confidential interview or a one-to-one meeting is necessary. Such interviews should be conducted in a room with visual access or an area which is likely to be frequented by other people. Another pupil or adult should be present or nearby. Where conditions cannot apply, staff should ensure that another adult knows that the interview is taking place'.

Parents

Parents play an important role in protecting their children from abuse. We are required to consider the safety of the child and should a concern arise, professional advice may be sought prior to contacting parents. If deemed appropriate, parents will be contacted, and we will continue to work with them to support the needs of their child. Consent from the parents will be sought, although in exceptional circumstances and with the best interests of the child being considered, this may be overridden.

We aim to help parents understand their responsibility for the welfare of all children, which includes their duty to refer cases to social care services and/or police in the interests of the child. The governing body will include a child protection statement in our prospectus and all parents can view a copy of this policy.

Parents that have concerns regarding a member of staff can in the first instance raise those with the Headteacher. This may involve sharing those concerns with the relevant agencies. Where the parent has concerns regarding the Headteacher, the chair of governors should be consulted in the first instance.

Parents can liaise with Ofsted on such conduct issues or regulatory concerns, advice can be found on its website www.ofsted.gov.uk**.**

On occasions Ofsted may forward complaints that may raise a safeguarding concern about our school via Family Connect. In such instances, we will work with all agencies within Family Connect to clearly respond to Ofsted on a case by case basis.

Parents/Carers can also access Ofsted Parent View which is an online survey questionnaire where parents can give their views. Where possible, this will be monitored regularly by the school/college to quickly address any concerns.

Parents can liaise with the Independent Schools Inspectorate (ISI) on such conduct issues or regulatory concerns, advice can be found on its website https://www.isi.net/parents-and-pupils/concerns-about-a-school or contact can be made direct to ISI, you can email concerns@isi.net or call 020 7600 0100 and ask to talk to an appropriate member of staff.

All complaints should be made via our complaint's procedures.

We will keep parents informed of all areas of safeguarding and child protection through the regular methods of communication.

We wish to make it clear to parents the standards, behaviour and respect we expect from them and conversely from us. If a parent's behaviour is a cause for concern, then we will ask them to leave our premises. We wish to make it clear that in serious cases, the head teacher can/will notify parents in writing that their implied licence to be on our premises is temporarily revoked, subject to any representations that the parent may wish to make. This setting will give parents the opportunity to formally express their views on the decision to bar in writing and this will be reviewed via the complaints policy.

Our setting is private place. We will therefore act to ensure they remain a safe place for all. The public has no automatic right of entry.

We expect parents to talk to us about any concerns they have about care and education provided by us in the first instance. We urge all parents not to express these concerns on social media platforms, at least not before sharing these concerns with us first.

Changing in school

We consider arrangements for safe changing of children for physical education (PE). We will be guided by the NSPCC guidance Best Practice for PE Changing Rooms. This consideration will come under our duty and remit of health & safety and in the context of children's welfare. We follow the guidance and do what we need to do in relation to organising changing facilities for children; staff supervision; changing areas for children with additional needs; changing considerations for drama productions and using off-site changing rooms. NSPCC factsheet

Part three: Safer Recruitment

We will meet all requirements as set out in Part three: Safer recruitment KCISE.

We commission human resources service to assist in the management of safer recruitment procedures.

Please see our safer recruitment procedures.

Recruitment and selection process

We aim to create a culture that safeguards and promotes the welfare of all children. As part of this culture, we will adopt robust recruitment procedures that help to deter and prevent people who are unsuitable to work with children from applying for or securing employment, or volunteering opportunities in our setting.

We will ensure that those involved with the recruitment and employment of staff to work with children have received appropriate safer recruitment training. At least one person on each interview panel have completed safer recruitment training. These persons will complete the TWSP recommended Safer Recruitment Consortium training.

The following persons have completed safer recruitment training in our setting:
Louise Lowings
Paula England
Helen Torr

Pre-appointment vetting checks, regulated activity and recording information

We will abide by the legal requirements when appointing individuals to engage in regulated activity relating to children. We understand the importance of ensuring the correct pre-appointment checks are carried out. These checks will help us to identify whether a person may be unsuitable to work with children (and in some cases is legally prohibited from working with children and/or working as a teacher). We see this as part of our wider safeguarding regime which will carry on following appointment.

Other checks that may be necessary for staff, volunteers and others

We will carry out the checks that are necessary for individuals who have lived or worked outside the UK; agency and third-party staff; contractors; trainee teachers; volunteers; governors and proprietors. We will fulfil our responsibilities in relation to other settings, including alternative provision, work experience and host families.

Visitors

We have different types of visitors, those with a professional role, those connected with the building, grounds maintenance, children's relatives or other visitors attending an activity.

We will not request DBS checks or barred list checks, or ask to see existing DBS certificates, for visitors such as children's relatives or other visitors attending a sports day. The

Headteacher/Principal will use their professional judgment about the need to escort or supervise such visitors.

For visitors who attend our setting in a professional capacity we will check their ID and seek assurance that the visitor has had the appropriate DBS check (or the visitor's employers have confirmed that their staff have appropriate checks).

Whilst external organisations can provide a varied and useful range of information, resources and speakers that can help us enrich children's education; careful consideration will be given to the suitability of any external organisations.

Alternative provision

Where we place a pupil with an alternative provision provider, we continue to be responsible for the safeguarding of that pupil and will undertake checks to be satisfied that the provider meets the needs of the pupil.

We will obtain written confirmation from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at the establishment.

Please see our Alternative provision policy.

Adults who supervise children on work experience

When organising work experience placements, we will ensure that the placement provider has policies and procedures in place to protect children from harm. We will ensure that relevant checks, including barred list checks have been obtained for people who supervise any children under the age of 16 on a work experience placement.

Children staying with host families (homestay)

If we arrange a homestay, we will consider the suitability of the adults in the respective families who will be responsible for the visiting child during the stay.

We will always consider what intelligence/information will best inform our assessment of the suitability of the adults in those families who will be responsible for the visiting child during the stay. We will use our professional judgement to decide what will be relevant. To help inform our assessment, we will obtain a DBS enhanced certificate with barred list information. This check will not only establish whether the adults are barred from engaging in regulated activity relating to children, but where criminal record information is disclosed, it will also allow us to consider, alongside all other intelligence that we have obtained, whether the adults would be a suitable host for a child. We will also decide whether it is necessary to obtain a DBS enhanced certificate in respect of anyone aged 16 or over in the household where the child will be staying.

Host families – homestay during exchange visits

We have a duty to safeguard and promote children's welfare. This extends to considering their safety and how best to minimise risk of harm to those children during any exchange visit we arrange, and when organising for the care and accommodation of a child with a host family (known as homestays) as part of the exchange.

We will follow the guidance set out in Annex E of KCSIE with regard to arranging homestay – suitability of adults in UK host families, homestay – suitability of adults in host families abroad and the additional action for extended homestays.

We will always ensure pupils understand who to contact during a homestay, should an emergency occur, or a situation arise which makes them feel uncomfortable.

Private fostering

We recognise that a private fostering occurs when a child under the age of 16 (under 18, if disabled) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative in their own home.

A child is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer. Such arrangements may come to the attention of school staff through the normal course of their interaction, and promotion of learning activities, with children.

By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify children's social care as soon as possible. If we become aware of a private fostering arrangement for a student that has not been notified to children's social care, we will encourage parents and private foster carers to notify them and will share information with children's social care as appropriate.

Our ongoing safeguarding of children and the legal reporting duties on us

We understand the importance of safeguarding vigilance beyond the recruitment process.

We believe safer recruitment is not just about carrying out the right DBS checks. Similarly safeguarding should not be limited to recruitment procedures. Good safeguarding requires a continuing commitment from our whole community to ensure the safety and welfare of children is embedded in all our processes and procedures, and consequentially enshrined in our ethos.

We aim to promote continuous vigilance, maintaining an environment that deters and prevents abuse and challenges inappropriate behaviour.

We aim to create the right culture and environment so that our staff feel comfortable to discuss matters both within, and where it is appropriate, outside of the workplace, which may have implications for the safeguarding of children. This can help assist us as employers to support staff, where there is a need, and help them manage children's safety and welfare, potentially providing them with information that will help them consider whether there are further measures or changes to procedures that need to be put in place to safeguard children in our care.

We will undertake our duty to refer to the Disclosure and Barring Service and to the Teaching Regulation Agency where required.