



## **SAFEGUARDING AND CHILD PROTECTION POLICY**

The Safeguarding and Child Protection Policy is in accordance with the most recent version of the ISSRs and locally agreed inter-agency procedures, specifically in accordance with Milton Keynes local safeguarding partner guidance MK Together for dealing with any concerns about a child.

This policy is applicable to all staff and parents of children within the nursery, including the Early Years Foundation Stage.

This document is available in written format upon request and a copy can also be located on the nursery's website.

***Safeguarding is everyone's responsibility and anyone can make a referral to the Milton Keynes Multi-Agency Safeguarding Hub (MASH).***

***The nursery will not tolerate any form of abuse.***

### **SAFEGUARDING AND CHILD PROTECTION POLICY REVIEW**

**This policy is reviewed on an annual basis, when changes in official guidance require and following a safeguarding incident. The nursery will continually review this policy following updates and guidance from the Independent Schools Inspectorate (ISI) and any statutory and local authority guidance.**

**Review Date:** September 2025

**Next Review Date:** September 2026

**Reviewed and approved by the Body of Persons:**

Mr Simon Driver (Chair) and Mrs Hilary Pauley

Date: 24.10.2025

Mr David Pye – Chair of Governors (Safeguarding and Child Protection)

Date: 24.10.2025



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## 1 INTRODUCTION

The safety and well-being of all children at the nursery in the Early Years Foundation Stage, is the nursery's highest priority. The nursery aims to know every child as an individual and to provide them with a secure and caring environment, so that they can develop and learn in safety. All those who come into contact with children and families in their everyday work, including practitioners who do not have a specific role in relation to safeguarding children, have a duty to safeguard and promote the welfare of children.

All members of staff have a duty to act in the child's best interests at all times so that every child feels positive about themselves as an individual and is able to reach their full potential. The nursery expects respect, good manners and fair play to be shown by everyone. All children should care for and support each other.

The nursery recognises that the welfare of the child is paramount and that all children, regardless of age, disability, gender reassignment, race, religion or belief, sex, pregnancy, maternity or sexual orientation, have the right to support and equal protection from all types of harm or abuse. The nursery also understands that some children are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other needs. The nursery will also consider its duty to make reasonable adjustments where necessary.

All staff share the responsibility to ensure that the nursery provides a safe, caring, positive and stimulating environment that promotes the social, physical and moral development of the individual child.

The nursery fosters a listening environment where children are encouraged to speak to any staff member about any concerns they may have and where staff understand the importance of listening to the child and placing the child's need first.

Parents and guardians have an important role to play in supporting the nursery. The nursery encourages parents and guardians to raise any issues or worries that they may have with the nursery.

The nursery will always respond immediately if there is a concern and/or allegation of child abuse/sexual abuse/sexual harassment/neglect/exploitation or where a child is identified as being at risk. Providing early help is vital to promoting the welfare of the child. Staff are trained to be alert to any potential concerns and risks to a child's welfare. All staff are trained to immediately inform the DSL (Designated Safeguarding Lead) or any one of the DDSLs (Deputy Designated Safeguarding Leads), if they have any concerns about a child's welfare.

**Safeguarding** is defined as protecting children from maltreatment (whether that is within or outside the home, including online), preventing impairment of children's health or development, ensuring that children are growing up in circumstances consistent with the provision of safe and effective care and taking action to enable all children to have the best possible outcomes.

**Contextual Safeguarding** recognises that the different relationships that children and young people form in their neighbourhoods, nurseries and online can feature violence and abuse. Parents/carers may have little influence over these contexts and children/young people's experiences of extra-familial abuse can undermine parent-child relationships.

**Child protection** is a part of safeguarding and promoting welfare. This refers to the activity that is undertaken to protect specific children who are suffering or likely to suffer significant harm.



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The nursery's procedures for safeguarding children have regard and adhere to the following statutory and non-statutory guidance:

- Keeping Children Safe in Education (KCSIE, September 2025).
- KCSIE (September 2025) Annex B: Further Information
- KCSIE (September 2025) Annex C: Role of the Designated Safeguarding Lead
- Working Together to Safeguard Children (Dec 2023)
- Prevent Duty Guidance for England and Wales (Dec 2023) inc. briefing notes on 'How social media is used to encourage travel to Syria and Iraq (July 2015)
- The Relationships Education, Relationships and Sex Education (RSE) and Health Education (Sept 2021) updated July 2025
- Early Years Foundation Stage Statutory Framework (September 2025)
- The Education (Independent Schools Standards) Regulations (2014).
- Working together to improve nursery attendance: statutory guidance for maintained schools academies, independent Schools and local authorities (August 2024).
- Children Missing Education (September 2025)
- GOV UK: Information Sharing: Advice for practitioners providing safeguarding services for children, young people and carers (May 2024)
- Disqualification under the Childcare Act 2006 (August 2018)
- Keeping children safe in and out of nursery settings (Sept 2023)
- DfE: After nursery clubs, community activities and tuition (safeguarding guidance for providers) (Sept 2023)
- MK Together – Milton Keynes Inter-Agency Safeguarding Children Policies and Procedures. (MKSCB – MK Together Team).
- MK Together – Milton Keynes Inter-Agency Safeguarding Children Policies and Procedures.
- GOV UK: What to do if you're worried a child is being abused (March 2015).
- GOV UK: Sharing nudes and semi-nudes: advice for education settings working with children and young people (March 2024)
- OFSTED: Review of sexual abuse in schools and colleges (June 2021).
- Safer Recruitment in Schools - Toolkit (Milton Keynes Council).
- Teaching Regulation Agency: Teacher Misconduct: The Prohibition of Teachers (Feb 2022)
- NPCC: When to call the police, non-statutory guidance for Schools & Colleges
- Preventing and Tackling Bullying (July 2017)
- Behaviour in schools (Feb 2024)
- Promoting children and young peoples' emotional health and well-being (Nov 2023)
- DfE Guidance: Mental Health and Behaviour in Schools (Nov 2018).
- Teaching Online Safety in Schools (Jan 2023)
- DfE: The Use of Social Media for On-line Radicalisation (July 2015)
- Digital and technology standards in schools and colleges (March 2025)
- DfE Generative Artificial Intelligence (AI) in Education (Aug 2025)
- GOV Cyber Security Standards for Schools and Colleges (updated March 2025)
- The UK Safer Internet Centre (<https://www.saferinternet.org.uk>)
- CEOP's Thinkuknow website ([www.thinkuknow.co.uk](http://www.thinkuknow.co.uk))
- Equality Act 2010
- GOV Statutory Guidance: Promoting the education of looked-after and previously looked-after children (July 2014, updated Feb 2018)



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### **2 THE AIMS OF THIS POLICY**

- To ensure that the Proprietorial Body, Head of EYFS and Governors fulfil their obligations in respect of the governance of safeguarding and child protection and Prevent awareness, including the conduct of an annual review of safeguarding and the effectiveness of the implementation of this policy.
- To raise awareness in all staff of their responsibilities to safeguard children, including the requirement to prevent children from being radicalised or drawn into extremism and ensure that staff are able to identify and report possible cases of abuse, neglect and exploitation and children at risk.
- To provide a means of monitoring children known or thought to be at risk of harm, including the risk of radicalisation and ensure that the nursery contributes to assessments of need and support plans for those children.
- To acknowledge the need for effective and appropriate communication between all members of staff in relation to safeguarding children.
- To develop structured procedures within the nursery which all members of the nursery will follow.
- To protect children from both online and offline risks, including online safety education and training, policies and procedures governing use of IT and procedures to manage any incidents which may occur; and filter and monitor online and offline activity.
- To ensure that all staff understand the particular vulnerabilities of children with special educational needs and/or disabilities (SEND) including particular vulnerability to child-on-child abuse and the need of extra pastoral support.
- To develop effective working relationships with all other agencies involved in safeguarding children.
- To provide an environment in which children feel safe, secure, valued and respected and to support the children in ways that will foster confidence, resilience and ensure they know how to approach adults if they are in difficulties.
- To ensure that all adults within the nursery, who have access to children, have been checked as to their suitability to work in the nursery.
- Raise awareness of child protection issues and equip children with the skills needed to keep themselves safe and support their mental well-being.

### **3 PROCEDURES**

- All members of staff, part-time staff, supply staff and volunteers are trained to identify and know how to respond to a child who discloses abuse, neglect and exploitation or who is possibly at risk of radicalisation and knows how to follow the procedures when sharing a concern of possible abuse, neglect and exploitation, the disclosure of abuse, neglect and exploitation or the risk of radicalisation.  
All parents/carers are made aware of the nursery's responsibilities and safeguarding procedures through publication of the nursery's Safeguarding and Child Protection Policy.
- The nursery's Safer Recruitment Policy and related procedures include all checks on staff suitability including Barred List, Disclosure and Barring Service Enhanced Disclosures and Prohibition Order checks, as recommended by KCSIE (September 2025) and by the MKTP and in accordance with current legislation.



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- All new staff will be given a copy of the following, as part of their induction into the nursery:
  - Keeping Children Safe in Education Part 1 and Annex B: Further Information (September 2025).
  - The Safeguarding and Child Protection Policy (including online safety and Children who are absent from Education and the names of the nursery's Designated Safeguarding Lead and the DDSLs.
  - The nursery's Code of Conduct for Staff.
  - The nursery's Whistleblowing Policy.
  - The nursery's Behaviour, Sanctions and Rewards Policy
  - Fire and Emergency Evacuation Procedures
  - Health and Safety
  - Mobile Phone Policy
  - Anti-Bullying Policy

### **4 RESPONSIBILITIES**

The nursery understands its responsibilities to safeguard children requires that all staff share any concerns they may have about children.

#### **4.1 The Proprietorial Body, Head of EYFS and Governors**

The Proprietorial Body, Head of EYFS and Lead Safeguarding Governor facilitate a whole-nursery approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of all systems, processes, and policies. Effective arrangements are in place to ensure:

- Continued safeguarding and promotion of the welfare of the nursery children and to fulfil the requirements of the latest statutory guidance and any other safeguarding regulations applicable to the nursery.
- Promotion of the nursery's effective working with other partnerships and agencies to safeguard the nursery's children and protect them from harm.
- Effective measures are taken to manage risk and protect children from harm, and to manage well any incidents that may occur.

Safeguarding and Prevent responsibilities are achieved through the following:

- Comply with their duties under legislation and to ensure that there is a robust Safeguarding and Child Protection Policy in place and that the policy is reviewed annually.
- Ensure that the key activities of the DSL and DDSL roles are included in the Job Descriptions.
- Ensure that DSL and DDSLs have additional time, funding, training, resources and supervision and support to fulfil their child welfare and safeguarding responsibilities effectively.
- Ensure there is an effective staff Code of Conduct policy in place.
- Record the efficiency with which any related duties have been discharged and ensure any deficiencies in the policy or practices are immediately rectified.
- Monitor the effectiveness of the implementation and compliance with the policy.
- Ensure that all staff are aware of the nursery's Safeguarding and Child Protection Policy and the procedures, follow them and know how to recognise and refer any concerns.
- Ensure that the Chair of Governors, as the lead Safeguarding Governor, liaises with the LADO and partner agencies in the event of allegations of abuse made against the Head of EYFS.
  
- Ensure that the DSL and DDSLs and the Safeguarding Governor contribute to inter-agency working as and when required to do so.



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- Ensure that all staff know that if there is a risk of immediate serious harm to a child a referral should be made to children's social care immediately.
- Ensure that all staff know that anybody can make a referral.
- Ensure the DSL oversees the safe use of technology, all electronic devices with imaging and sharing capabilities (mobile phones and cameras, etc.) in the setting.
- Ensure that all staff knowledge and training is up to date for safeguarding and child protection and Prevent awareness training, including online safety training.
- Ensure that the nursery operates appropriate filtering and monitoring systems to safeguard children online and offline and review their effectiveness and ensure the nursery's children know how to stay safe while online. This will include considering how online safety is reflected as required in all relevant policies and considering online safety whilst planning the curriculum, any staff training, the role and responsibilities of the DSL/DDSL's and any parental engagement.
- Ensure that there are safe and effective recruitment policies in place, which adhere to KCSIE statutory guidelines (September 2025) and ensure applicable regulatory requirements relating to suitability of staff, supply staff and proprietors are met
- Ensure that all records pertaining to safeguarding and child protection are kept securely.

### **4.2 Designated Safeguarding Lead and Deputy Designated Safeguarding Leads**

- Mrs Nicola Wilson, Head of /EYFS, is the Designated Safeguarding Lead (DSL) who understands the role as per Annex C of KCSIE (September 2025) and understands the obligation to liaise with the local authority and work with other agencies in line with the Working Together to Safeguard Children (Dec 2023).
- The Designated Safeguarding Lead and Deputy Designated Safeguarding Leads are named in Appendix 1.
- The DSL and DDSLs will undergo child protection training every two years, in line with advice from the Milton Keynes local safeguarding partner guidance MK Together Partnership (MKTP) and this will incorporate Prevent awareness training. The DDSLs, as well as the DSL, will have overall responsibility for online and offline safety, including filtering and monitoring systems in place and review their effectiveness at the nursery.
- The nursery recognises the important role that the DSL and DDSLs have to play and will support them with the training necessary to carry out their roles effectively. In addition to their formal training, the knowledge and skills of the DSL/DDSLs will be updated regularly and at least annually. This can be in the form of referring to the most recent version of KCSIE, bulletins from the MKTP, on the publication of new DfE guidance and other safeguarding updates and communications via meetings.
- The DSL and DDSLs will refer a child to the Milton Keynes Multi-Agency Safeguarding Hub (MASH) in accordance with the Milton Keynes local safeguarding partner (MKTP) guidance and procedures, if there are concerns about a child's welfare and/or possible abuse, neglect and exploitation, Police (cases where a crime may have been committed) and to the Channel programme where there is a radicalisation concern.
- Allegations of abuse by a member of staff will be referred to the Local Authority Designated Officer (LADO). A written record of the referral will be emailed to the LADO as soon as possible within the nursery day.
- An allegation of abuse by someone outside of the nursery setting will be referred by the DSL to the Milton Keynes Multi-Agency Safeguarding Hub (MASH).
- The DSL will ensure that detailed and accurate written records of concerns about a child are kept even if there is no need to make an immediate referral.



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### **5 PROCEDURES FOR A CHILD REPORTING ABUSE, NEGLECT AND EXPLOITATION**

Children who have a problem may speak to someone whom they trust. It is important that the member of staff to whom the child wishes to speak about a concern, does not promise confidentiality.

All children will be reassured that they are being taken seriously and that they will be supported and kept safe. A child will never be given the impression that they are creating a problem by reporting abuse, sexual violence, or sexual harassment. Nor will they ever be made to feel ashamed for making a report or have their experience minimised.

A child who is insistent upon confidentiality should be referred to an external source, such as ChildLine. A list of contacts is provided in Appendix 1. The contact details for ChildLine are displayed throughout the nursery.

Staff will be reminded that 'children may not feel ready or know how to tell someone that they are being abused, exploited or neglected and/or they may not recognise their experiences as harmful.'

However, if there is a concern that the child is suffering or at risk from suffering significant harm, regardless of the fact they want to maintain confidentiality, the matter must be referred to the DSL who will in turn, refer the matter to the Milton Keynes Multi-Agency Safeguarding Hub (MASH). Parental consent is not required to make a referral when there are grounds to believe the child may be at risk of significant harm.

- If the child is only prepared to speak if absolute confidentiality is guaranteed, the member of staff should terminate the conversation at that point. It should be explained to the child that confidentiality cannot be promised. Explain to the child that the member of staff is obliged to inform the DSL.
- The adult, to whom the child has spoken, should immediately provide the DSL with a written account of what has transpired.
- If a child decides to speak to a member of staff about the fact that either they, or a child known to them, is being bullied, harassed, exploited or abused, neglected and exploited, the member of staff should listen to the child's account and not ask leading or detailed questions. Allow the child to tell their own story.

**All staff to note:** It is important to understand that subsequent enquiries could be prejudiced by asking detailed and/or leading questions in nursery. Defendants have been acquitted where leading questioning or inappropriate investigations have been proven.

- The DSL will refer the concern immediately to Milton Keynes Multi-Agency Safeguarding Hub (MASH) which will decide how the matter will be investigated or assessed.
- The DSL will liaise with and receive guidance from the Milton Keynes Multi-Agency Safeguarding Hub (MASH) about how best to support and monitor the child concerned through any process of investigation and about any liaison with parents, carers or other agencies involved.
- Explain to the child that only those who have a professional 'need to know' will be told and, if appropriate, measures will be set up to protect the child from retaliation and further abuse.
- Reassure the child that they were right to tell, and that they are not to blame for having being bullied or abused.
- The nursery will collaborate with MKTP in any investigations, assessments or planning processes.



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Where there are evident signs of physical injury the Milton Keynes Multi-Agency Safeguarding Hub (MASH) must be immediately notified. In such a case, parental consent is not required to make a referral.

### **6 ALLEGATIONS OF ABUSE AGAINST TEACHERS AND OTHER STAFF, INCLUDING SUPPLY STAFF AND CONTRACTORS**

The nursery makes reference to KCSIE (September 2025) Part 4 - Section One: "Allegations that may meet the harms threshold" and Section Two "Concerns that do not meet the harm threshold" and the requirements of the most recent version of the Independent Schools Standards Regulations.

Any allegation received relating to an incident that may happen when an individual or organisation is using the nursery premises for the purposes of running activities for our children will be dealt with in line with the nursery's safeguarding policies and procedures, including informing the LADO as we would do with any safeguarding allegation.

The Nursery's procedures for managing concerns or allegations against staff (including supply staff, volunteers and contractors) who are currently working in the Nursery whether in a paid or unpaid capacity follows DfE statutory guidance and Milton Keynes local safeguarding partner MK Together arrangements and applies when staff (including volunteers) have (or are alleged to have):

- Behaved in a way that has harmed a child, or may have harmed a child; and/or
- Possibly committed a criminal offence against or related to a child; and/or
- Behaved towards a child or children in a way that indicated that they may pose a risk of harm if they were to work regularly or closely with children; and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children, including behaviour that may have happened outside of nursery.

#### **6.1 Allegations that may meet the harm threshold**

These are allegations that might indicate that a person would pose a risk of harm if they continue to work in their present post, or in any capacity with children in a nursery, school or college.

Aspects to consider when an allegation is made:

- looking after the welfare of the child;
- investigating and supporting the person subject to the allegation.

When dealing with allegations, the nursery will:

- apply common sense and judgement;
- deal with allegations quickly, fairly and consistently; and
- provide effective protection for the child and support the person subject to the allegation.

If an allegation is made, then the member of staff receiving the allegation must inform the Case Manager, who will be either the DSL or Head of EYFS and will lead any investigation. Where the Head of EYFS is the subject of an allegation, the Director of Child Welfare at Milton Keynes Preparatory School and/or the chair of governors or Proprietorial Body will be the case manager.

The case manager should immediately discuss the allegation with the LADO and consider the nature, content and context of the allegation and agree a course of action including any involvement of the police.



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Where the case manager deems there to be an immediate risk to children or there is evidence of a possible criminal offence, or it is an emergency situation, the case manager should contact children's social care and as appropriate the police immediately. All discussions should be recorded in writing, and any communication with both the individual and the parents of the child(ren) agreed. The LADO should be informed within one working day of all allegations that come to the Nursery's attention and appear to meet the criteria or that are made directly to the police and/or children's social care. The DSL is responsible for ensuring the child is not at risk.

Where the case manager is concerned about the welfare of other children in the community, or the member of staff's family, they will discuss these concerns with the LADO and make a risk assessment of the situation. It may be necessary for the LADO to make a referral to children's social care.<sup>90</sup>

When to inform the individual who is the subject of the allegation will be considered on a case-by-case basis and with guidance from the LADO, and if appropriate, the police and/or children's social care. Subject to any objection, the case manager will ensure that the individual who is subject of the allegation is informed as soon as possible and given an explanation of the likely course or action. The case manager will appoint a named representative to keep the individual informed of the progress of the case and will consider what other support is appropriate for the individual.<sup>91</sup>

The case manager should give careful consideration as to whether the circumstances of the case warrant suspension from contact with children at the Nursery or whether alternative arrangements should be put in place until the allegation is resolved. The following alternative arrangements should be considered by the case manager before suspending a member of staff<sup>92</sup>:

- redeployment within the Nursery so that the individual does not have direct contact with the child or children concerned;
- providing an assistant to be present when the individual has contact with children;
- redeploying to alternative work in the Nursery so the individual does not have unsupervised access to children;
- moving the child or children to classes where they will not come into contact with the member of staff, but this decision should only be made if it is in the best interest of the child or children concerned and takes accounts of their views. It should be made making it clear that this is not a punishment and parents have been consulted; or,
- temporarily redeploying the member of staff to another role in a different location, for example to an alternative site where available.

These alternatives allow time for an informed decision regarding the suspension, this will, however, depend upon the nature of the allegation.

Suspension should not be an automatic response when an allegation is reported. It should be considered only in cases where there is cause to suspect a child or other children at the Nursery is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. The case manager will give due weight to the views of the LADO, *WT* and *KCSIE* when making a decision about suspension (including with respect to considering alternatives). Where the individual is suspended, the case manager will confirm the decision within one working day, and will ensure they know who their point of contact is in the Nursery and shall provide them with their contact details. The case manager will also record the rationale and justification for the suspension, including what alternatives were considered and why they were rejected.



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Where further enquiries are required to enable a decision about how to proceed, the LADO and case manager should discuss how and by whom the investigation will be undertaken. The LADO will provide advice and guidance to the Nursery to ensure that an appropriate investigation is carried out. In straightforward cases, the investigation should usually be undertaken by a senior member of staff at the Nursery. Where there is lack of resource, or the nature or complexity of the allegation requires it, an independent investigator may be appointed to undertake the investigation.

The case manager will ensure that parents are informed as soon as possible and kept informed about progress of the case, subject to any advice from children's social care or the police. Parents and others will be made aware that there are restrictions on publishing information which may lead to the identification of the teacher subject to the allegation.

The case manager will monitor the progress of cases to ensure they are dealt with as quickly as possible in a thorough and fair process. The outcome of the investigation of an allegation will record whether it is substantiated (sufficient evidence to prove it), unsubstantiated (insufficient evidence either to prove or disprove it), false (sufficient evidence to disprove it), malicious (sufficient evidence to disprove it and that there has been a deliberate act to deceive or cause harm to the person subject of the allegation) or unfounded (to reflect cases where there is no evidence or proper basis which supports the allegation being made).

Reviews are conducted at fortnightly or monthly intervals, depending on the complexity of the case. The first review will take place no later than four weeks after the initial assessment and subsequent review dates will be set at the review meeting.

The case manager will discuss with the LADO whether a referral to the Disclosure and Barring Service or Teaching Regulation Agency should be made where an allegation is substantiated and the person is dismissed or the Nursery ceases to use their services, or the person resigns or otherwise ceases to provide their services.

The Nursery has a legal obligation to report promptly to the Disclosure and Barring Service any person (whether employed, contracted, a volunteer or a student) who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. Further, or in the alternative, if an investigation leads to the dismissal or resignation prior to dismissal of a member of teaching staff specifically, the Nursery must consider making a referral to the Teaching Regulation Agency and a prohibition order may be appropriate (because that teacher has displayed unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction at any time for a relevant offence).

On conclusion of the case, the case manager should review the circumstances of the case with the LADO to determine whether there are any improvements to be made to the Nursery's safeguarding procedures or practices to help prevent similar events in the future. Learning lessons where the allegation is concluded to be either, unfounded, false, malicious or unsubstantiated, the case manager (and if they have been involved, the LADO) should consider the facts and determine whether any lessons can be learned and if improvements can be made.

Where an individual is removed from regulated activity, or would have been removed had the individual not left, including when they are suspended, redeployed to work that is not regulated activity, are dismissed, or have resigned, and the individual has engaged in relevant conduct in relation to children and/or adults, and/or satisfied the harm test in relation to children and/or vulnerable



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adults, and/or been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence, the Nursery will make a referral to the DBS.

The Nursery has a duty of care to its staff, and whilst the welfare of a child is paramount, the Nursery will offer appropriate welfare support to the adult subject to the investigation and potentially their family. The Nursery will also make every reasonable effort to maintain confidentiality and guard against unwanted publicity whilst an allegation is being investigated or considered. Information will also not ordinarily be shared with other staff or with children or parents who are not directly involved in the investigation.

Where initial discussions lead to no further action, the case manager and the LADO should record the decision and justification for it and agree on what information should be put in writing to the individual concerned, and by whom.

Allegations found to be malicious or false will be removed from the individual's personnel records unless the individual gives consent for retention of the information. In all other circumstances a written record will be made of the decision and retained on the individual's personnel file in accordance with *KCSIE* and a copy will only be provided to the individual concerned. The information to be kept on file includes a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, a note of any action taken, decisions reached and the outcomes, and a declaration on whether the information will be referred to in any future reference. All records should be retained until the accused has reached pension age, or for a period of 10 years from the date of the allegation, whichever is longer. Records should be reviewed at the end of the retention period in case it is necessary to keep it for longer.

Allegations proven to be false, unsubstantiated, unfounded or malicious will not be included in employer references. If an allegation is shown to be deliberately invented or malicious, the DSL should 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 children's social care may be appropriate. If a report is shown to be deliberately invented or malicious, the Head of EYFS will consider whether any disciplinary action is appropriate against a child who made it in accordance with the Nursery's behaviour policy; or whether the police should be asked to consider if action might be appropriate against the person responsible even if they are not a child.

Where an allegation is against the Head of EYFS, the Head of EYFS must not be informed of the allegation prior to contact with Emma Hanley at Milton Keynes Preparatory School (chair of governors and/or Proprietorial Body) and the LADO. The LADO should be informed within one working day to discuss the allegation, consider the nature, content and context of the allegation, and agree a course of action including any involvement of the Police. All discussions will be recorded in writing and the nursery will follow the procedures agreed with the LADO.

If the allegation made is concerned with the Proprietorial Body, the Head of EYFS/DSL or one of the DDSLs, then the member of staff receiving the allegation must inform the Chair of Governors, without informing the Head of EYFS. The Chair of Governors should immediately refer to the LADO. Should there be a conflict of interest, the LADO will be informed directly.

GDPR will not be allowed to stand in the way of safeguarding children.

In the absence of the DSL, the member of staff must inform the Chair of Governors. Contact details for the LADO and the Chair of Governors are contained in Appendix 1.

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The DSL/Head of EYFS/DDSLs are fully aware of the local authority arrangements for managing allegations, including contact details and the information the LADO will need. Prior to contacting the LADO, the nursery may – in line with local procedures – conduct basic enquiries to establish facts that will help determine whether there is any foundation to the allegation. The DSL will refer to KCSIE (September 2025) for sample questions to aid with the basic enquiries.

The DSL/DDSLs understand and will refer to KCSIE (September 2025) for more detailed guidance on:

- The initial response to an allegation
- Where an initial discussion leads to no further action
- Where further enquiries are required to enable a decision about how to proceed
- Allegations against supply teachers and all contracted staff
- Governors
- Suspension
- Supporting those involved
- Confidentiality and information sharing
- Allegation outcomes
- Following a criminal investigation or prosecution
- Unsubstantiated, unfounded, false or malicious accusations
- Returning to work
- Resignations and settlement agreements
- Record keeping
- References
- Learning lessons (expanded in 2023)
- Non-recent allegations.

When an allegation is made, the nursery will not undertake its own investigations of the allegations without prior consultation with the LADO or, in the most serious cases, the Police, so as not to jeopardise statutory investigations. In borderline cases, discussions with the LADO can be held informally and without naming the nursery or individual. Discussions will be recorded in writing, and any communication with both the individual and the parents of the child/children agreed.

The nursery will promptly report to the Disclosure and Barring Service (DBS) any person leaving the nursery (whether employed, contracted, a volunteer or student) whose no longer used for regulated activity or due to dismissal, non-renewal of a fixed-term contract, no longer engaging/refusing to engage a supply teacher provided by an employment agency, terminating the placement of a student teacher or other trainee, no longer using staff employed by contractors, no longer using volunteers, resignation, and voluntary withdrawal from supply teaching, contract working, a course of initial teacher training, or volunteering (or would have been, had the person not left the setting first) because they are considered unsuitable to work with children (that is, they have caused harm or posed a risk of harm to a child). Reports will include as much evidence about the circumstances of the case as possible. The nursery understands that failure to make a report constitutes a criminal offence.

Compromise agreements cannot be used to either prevent a referral being made to the DBS when it is legally required, nor can an individual's refusal to cooperate with an investigation.

The nursery will be required to keep detailed and accurate written records and preserve these for the term of the independent enquiry and at least until the accused has reached normal pension age or for 10 years from the date of the allegation if it that is longer.



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The Proprietorial Body understands the legal duty to respond to requests from the DBS for information the nursery already hold.

The nursery will consider making a referral to the Teacher Regulation Agency (TRA) for any teacher that has been dismissed (or would have been dismissed had he/she not resigned) and a Prohibition Order may be appropriate. The reasons such an order would be considered are 'unacceptable professional conduct, 'conduct that may bring the profession into disrepute' or a 'conviction, at any time, for a relevant offence'. Further guidance is published on the TRA website (Teacher Misconduct: The Prohibition of Teachers, February 2022).

As per the KCSIE (September 2025) guidance, the nursery will handle allegations against supply staff or contractor staff by taking the lead and keeping the supply agency fully informed and involved. Under no circumstances will the nursery cease to use supply staff for safeguarding reasons without involving the agency and/or other authorities.

The nursery understands its duty to confirm it has disclosed to inspectors all instances of safeguarding concerns.

### **6.2 Concerns that do not meet the harm threshold ('low-level concerns')**

The nursery is committed to create and embed a culture of openness, trust and transparency in which the nursery's values and expected behaviour as set out in the staff code of conduct are constantly lived, monitored and reinforced by all staff. This serves to enable the early identification of concerning, problematic or inappropriate behaviour, minimise the risk of abuse, ensure that adults working in nurseries are clear about and act within professional boundaries in accordance with the values and ethos of the nursery, and protect those working in or on behalf of nurseries and schools from potential false allegations or misunderstandings.

These may arise from a variety of sources, including suspicion, complaint, a disclosure (by child or adult) or during vetting checks. The nursery understands that a culture should be created in which all concerns about adults are shared responsibly and with the right person, recorded and dealt with appropriately.

A low-level concern does not mean it is insignificant, a low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult may have acted in a way that:

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

These behaviours can exist on a wide spectrum, from inadvertent to that which is ultimately intended to enable abuse. They include, for example:

- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone or any electronic device with imaging and sharing capabilities;
- engaging with children on a one-to-one basis in a secluded area or behind a closed door;
- using inappropriate sexualised, intimidating or offensive language;
- humiliating children.



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Low-level concerns about a member of staff must be reported to the Head of EYFS/DSL. Staff should feel confident to self-refer. Low-level concerns about someone employed by a supply agency or contractor should be shared with the Head, the concern recorded, and their employer notified so that potential patterns of inappropriate behaviour can be identified. Should patterns be identified, the Head/Case Manager will take appropriate action, depending on the severity of the behaviour.

Where a third party has raised the concern, the Head of EYFS will collect as much evidence as possible by speaking:

- directly to the person who raised the concern (if known);
- to the individual involved and any witnesses.

The DSL/Head will record all low-level concerns in writing. This will include:

- details of the concern;
- the context in which it arose;
- evidence collected by the DSL where the concern has been raised via a third party;
- the decision categorising the type of behaviour;
- action taken;
  
- the rationale for decisions and action taken;
- the name of the individual sharing the concerns (respecting any wish to remain anonymous as far as possible).

The nursery will refer to KCSIE (September 2025) as to when a low-level concern should be referred to in a reference. The DSL/Head will make the final decision on all low-level concerns.

### **6.3 Procedure for managing and allegations about supply teachers and contractors.**

The Nursery's procedures for managing allegations against staff above also apply to staff not directly employed by the Nursery, for example, supply teachers provided by an employment agency or business ('the agency'). The Nursery will usually take the lead but agencies should be fully involved (because they have their own policies and procedures) and co-operate with any enquiries from the LADO, police and/or children's social care.

In no circumstances will the Nursery decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome. The Nursery will discuss with the agency (or agencies where the supply teacher is working across a number of schools or nurseries) whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the nursery, whilst they carry out their investigation.

The Nursery will advise supply teachers being investigated to contact their trade union representative if they have one, or a colleague for support. The allegations management meeting which is often arranged by the LADO should address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency are taken into account by the Nursery during the investigation.

When using an agency, the Nursery should inform the agency of its process for managing allegations but also take account of the agency's policies and their duty to refer to the DBS as personnel suppliers. This should include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies.



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Where the agency dismisses or ceases to use the services of a teacher because of serious misconduct, or might have dismissed them or ceased to use their services had they not left the Nursery first, the Nursery must consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency).

### **6.4 Record Keeping**

Records are confidential, held securely and comply with the Data Protection Act 2018 and the UK GDPR. They are reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where such a pattern is identified, the nursery will either take action through disciplinary procedures or, if it meets the harms threshold, refer to the LADO.

The nursery may also consider whether there are wider cultural issues within the nursery that enabled the inappropriate behaviour to occur and will therefore support staff where necessary, i.e., staff training. Information is kept at least until the individual leaves' employment.

For all allegations, other than those found to have been malicious or false, the following information will be kept on the file of the person accused:

- a clear and comprehensive summary of the allegation
- details of how the allegation was followed up and resolved
- a note of any action taken, and decisions reached and whether the outcome was substantiated, unsubstantiated or unfounded.
- a copy provided to the person concerned, where agreed by children's social care or the police
- a declaration on whether the information will be referred to in any future reference

Substantiated allegations will also be included in references, provided that the information is factual and does not include opinions.

### **7 STAFF CODE OF CONDUCT**

The nursery's staff code of conduct policy is given to all staff upon induction to the nursery. The policy is given to provide clear guidance about behaviour and acceptable actions so as not to place children or staff at risk of harm or of allegations of harm to a child.

- *Please refer to the separate document: Staff Code of Conduct*

### **8 WHISTLEBLOWING**

Whistleblowing is a mechanism by which staff can voice their concerns, made in good faith, without fear or repercussion. The nursery's Whistleblowing Policy provides for:

- a culture of safety and raising concerns;
- a culture of valuing staff and or reflective practice;
- procedures for reporting and handling concerns, including about poor or unsafe practice and potential failures in the nursery's safeguarding regime, provision for mediation and dispute resolution where necessary;
- training and support for staff;
- transparency and accountability in relation to how concerns are received and handled.

- *Please refer to the separate document: Whistleblowing Policy*



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### **9 CHILD-ON-CHILD ABUSE, SEXUAL VIOLENCE AND SEXUAL HARASSMENT**

This procedure is for dealing with abuse by one or more children against another child. All child-on-child abuse is unacceptable and will never be tolerated – the nursery has a ‘zero-tolerance’ approach on any form of abuse. Child-on-child abuse can take many forms, for example, making abusive comments, which should not be passed off as ‘banter’ or ‘having a laugh’ or ‘part of growing up’, ‘boys being boys’ engaging in abusive interactions, making abusive comments and/or engaging in activity of a sexualised nature (including sexual activity without consent, sexual violence and harassment), physical abuse, initiation ceremonies or rituals or hazing-type violence, upskirting and sexting (youth-produced sexual imagery) or any type of bullying, including online bullying, prejudice-based bullying or discriminatory bullying, as this can lead to a culture of unacceptable behaviours and an unsafe environment for children.

The nursery understands that sexual violence and sexual harassment can occur between two children of any age and sex and within intimate personal relationships between peers. Sexual violence and sexual harassment can overlap and can happen outside of nursery or take place online and offline. When there is ‘reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm’ then any such abuse will be referred to the DSL and the Milton Keynes Multi Agency Safeguarding Hub (MASH) as a child protection concern.

The nursery recognises the importance that all staff must challenge any form of abusive behaviour between children. Staff are trained to recognise that children can abuse other children (including online and offline) and that all staff will be clear about the nursery’s procedures with regard to child-on-child abuse. The Nursery also recognises that even if there are no reported cases of child-on-child abuse, such abuse may still be taking place and is simply not being reported

Sexting, for the purposes of this policy, is defined as the generation and/or sharing of images or videos by children under the age of 18 where such images or videos are shared with another child or children or adult via a mobile phone, tablet, laptop, computer or website or any electronic device with imaging and sharing capabilities. Sexting is classed as illegal. *Further guidance can be sourced from the DfE Searching Screening and Confiscation Advice and the UK Council Child for Internet Safety (UKCIS): Sexting in Nurseries and Colleges.*

The nursery recognises the gendered nature of abuse i.e. that girls are more likely to be victims and boys more likely to be perpetrators. However, the nursery will always be clear that all child-on-child abuse is unacceptable and will be taken seriously. Staff recognise that children are capable of abusing other children (including online and offline) and therefore understand the importance of the nursery’s policies and procedures with regard to child-on-child abuse.

Abuse that occurs online or outside of the nursery will not be downplayed and will be treated equally seriously.

Different forms of child-on-child abuse, child-on-child sexual violence and sexual harassment can be as follows:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers;
- physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexual violence and sexual harassment (refer to Part 5 KCSIE September 2025);



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- consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth-produced sexual imagery)(further guidance sourced from: *UKCIS guidance: Sharing nudes and semi-nudes advice for educational settings*;
- 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;
- upskirting (see definition at 13.16 below); and
- initiation/hazing type violence and rituals.

### **9.1 Prevention of child-on-child abuse**

The nursery recognises that child-on-child abuse (including online and offline) can occur even with the most robust policies and support processes in place. Even if there are no reported cases of child-on-child abuse, such abuse may still be taking place and is simply not being reported. Therefore, the nursery encourages an environment where children can feel safe to share information about anything which worries them or causes them to feel upset. Appropriate behaviour is regularly reinforced through assemblies, circle time discussions and PSHE lessons.

### **9.2 Procedures for dealing with child-on-child abuse**

Staff, to whom the concerns are reported, should listen to child's concerns and offer immediate support. Staff will not dismiss anything reported to them which appears to be 'banter' or 'just growing up' or 'boys will be boys'. Staff should refer the child immediately to the DSL, or, in their absence, a DDSL.

- The DSL will reassure the child that they have done nothing wrong and that it was the right thing to report. If appropriate, immediate medical treatment/advice should be sought.
- If the concerns relate to sexting, then staff must not share or copy the images with other staff members.

The DSL will listen to the child and make a written record of the incident, identify evidence and seek witnesses. The DSL will not guarantee confidentiality of information and will inform the child that the nursery will be speaking to inter-agency bodies and the alleged abuser(s)

- The DSL will inform parents.
- The nursery will report to Milton Keynes Multi Agency Safeguarding Hub (MASH) within 24 hours of a disclosure or suspicion of abuse.

### **9.3 Procedures for dealing with Sexual Violence and/or Sexual Harassment:**

Where there has been a report of sexual violence and/or sexual harassment, the DSL will make an immediate risk and needs assessment which should be recorded in writing, and which considers:

- The victim and their need for protection and support.
- The alleged perpetrator, their proximity to the victim and if steps need to be taken to keep them apart, if sharing a class or nursery transport, for example.
- All other children, where there is a need to protect them.

The immediate consideration will be what support to provide to the child, the alleged perpetrator and other children involved/impacted. The wishes of the victim, the nature of the allegations and the protection of all children in the nursery will be of paramount importance when considering immediate actions to take.



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In the event of any disclosure about child-on-child abuse that all children involved, whether perpetrator or victim, will be treated as being “at risk” and placed on the nursery Watchlist record, which is reviewed by the Head of EYFS. The DSL will follow guidance provided by the Milton Keynes Multi Agency Safeguarding Hub (MASH).

Each case reported will be considered on an individual basis. The DSL, in conjunction with any guidance provided by the Milton Keynes Multi Agency Safeguarding Hub (MASH), will consider the following options:

1. To manage the case of sexual harassment internally, if the children involved are not in need of early help or statutory intervention and that it would be appropriate to manage the incident internally.
2. To consider if multi-agency early help is the appropriate course of action.
3. If the child has been harmed, or is at risk of harm, or is in immediate danger, the DSL should make a referral to Milton Keynes Multi Agency Safeguarding Hub (MASH) for advice or to make a referral, or out of hours Emergency Social work team. Such referrals will be made immediately.
4. To report to the Police. If this option is chosen, then a parallel report will be made to the Milton Keynes Multi Agency Safeguarding Hub (MASH). The nursery will inform parents unless, to do so, would put the child at additional risk.

The nursery will provide appropriate on-going support to the children involved, where appropriate and in conjunction with multi-agency professionals.

The DSL may consider referring to the departmental advice: *Sexual Violence and Sexual Harassment Between Children in Nurseries and Colleges*.

### **10 ALLEGATIONS OF ABUSE AGAINST PERSONS OUTSIDE OF THE NURSERY, ONLINE AND OFFLINE**

In the case of allegations of abuse by persons outside of the nursery where a child’s welfare, possible abuse, neglect and exploitation is of concern, then the member of staff will refer the matter to the Head of EYFS, the DSL or a DDSL if the Head of EYFS is not available. The DSL will then liaise with the Milton Keynes Multi Agency Safeguarding Hub (MASH) in the first instance.

A written record of the referral will be e-mailed to the Milton Keynes Multi Agency Safeguarding Hub (MASH) as soon as possible within the same nursery day. The DSL will be required to keep detailed and accurate written records of all concerns about a child, even if there is no need to make an immediate referral.

### **11 GUIDANCE IF INAPPROPRIATE BEHAVIOUR IS NOTICED BY ANOTHER MEMBER OF STAFF**

If a member of staff has concerns about the behaviour of another member of staff towards a child, they should report the concerns immediately to the DSL/Head of EYFS. Any concerns will be thoroughly investigated. If there is evidence of criminal activity, the Police will always be informed. Wherever possible and subject to the rights of the child, the member of staff will be informed of the outcome of the investigation.

All staff are trained to report and manage a genuine concern with impunity.



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### **12 INFORMATION SHARING**

Sharing information is essential for effective safeguarding and promoting the welfare of children. All staff are reminded that the General Data Protection Regulation (GDPR) introduced in May 2018 and the Data Protection Act 2018 are not barriers to justified information sharing to protect a child from harm or the risk of harm.

When a child moves nursery or school, in addition to handing over any child protection file securely within 5 days, the DSL may proactively share information with the new nursery or school to enable the new nursery to have support in place when a child arrives and to ensure that key staff, such as the SENCO, are aware of any needs.

The safeguarding of children at risk is a condition that allows safeguarding practitioners to share information legally without consent, if, to gain consent, could place a child at risk.

Relevant personal information can be shared lawfully if it is to keep a child safe from neglect or physical, emotional or mental harm, or if it is protecting their physical, mental or emotional well-being.

All concerns, discussions and decisions made, including the rationale for those decisions, will be recorded. These recordings will include instances where referrals were or were not made to an outside agency.

### **13 PREVENTION**

The nursery recognises that it plays a significant role in preventing harm to children in the following ways:

- Across the curriculum, opportunities are provided that equip children with the skills they need to stay safe from harm and to know to whom they should turn to for help.
- The nursery will ensure children are taught about how to stay safe, based on a wide view of what may happen to children, not only in nurseries but also beyond it. This will include staying safe online and offline and the dangers of cyberbullying and sexting – even if children in a particular faith community are not meant to use mobile phones, or any other electronic device with imaging and sharing capabilities, or have limited access to the internet.
- Particular attention will be paid to the nursery's practices to help children to adjust their behaviours in order to build resilience and reduce risks, including those of radicalisation. They will also be taught about the importance of telling a teacher/other member of staff if they come across something online or offline which makes them uncomfortable, especially staying safe online and the dangers of cyberbullying or sexting, even in cases where children only have limited internet or electronic devices with imaging and sharing capabilities access.
- Ensure that all children know there is an adult in the nursery whom they can approach if they are worried or in difficulty.
- Establish and maintain an ethos, which is understood by all staff, which enables children to feel secure and encourages them to talk knowing that they will be listened to.
- All children have access to a public telephone should they need to call a helpline (ChildLine) for support.
- Leadership training is provided to Head Boys and Girls, Deputies and House Captains, which specifically covers the importance of offering support and assistance to younger children.



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- The nursery has an appropriate policy in place when dealing with abuse by one or more children against another child when there is 'reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm' including that any such abuse will be referred to the local authority as a child protection concern. The nursery will ensure that in the event of any disclosures about child on child abuse that all children involved, whether perpetrator or victim, are treated as being 'at risk'.

Any nursery decision to seek support for a child in need or at risk, or about whom there are concerns (including concerns relating to radicalisation) would normally be taken in consultation with parents. Parent consent would not be required where there are reasonable grounds to believe that a child is a risk of significant harm.

### **13.1 Anti-Bullying**

The nursery will not tolerate any kind of bullying, harassment, victimisation or discrimination. The nursery takes any kind of bullying, both physical and emotional (which may cause psychological damage) very seriously, including any bullying on the basis of a protected characteristic (grounds of race, religion, gender, sexual orientation, special educational needs or disabilities), or because a child is adopted, in care or has caring responsibilities. The nursery will have a zero tolerance towards transphobia. It might be motivated by actual differences between children, or perceived differences. The nursery will treat all children and parents fairly and with consideration and we expect them to reciprocate towards each other, the staff and the nursery. Any kind of bullying is unacceptable. The nursery's Anti-Bullying Statement is displayed publicly and provides advice on where children can seek help.

- *Please refer to the separate document: Anti-Bullying Policy.*

### **13.2 Children who are Absent from Education (CME)**

It is recognised that one of the signs of children being at risk of or being harmed is when the child is absent from nursery without explanation, particularly on a regular basis. The nursery works with parents to ensure that it is able to account for every child who is absent from nursery. Parents are asked to telephone the nursery on the first and every successive day of illness. In exceptional circumstances, the Heads may authorise absence from nursery during term-term and only where the absence will have an educational value.

When a child is not in nursery without an explanation, then the nursery will contact parents for an explanation. The nursery will hold a minimum of two emergency contacts for each child. Where a child is absent from nursery and contact cannot be made with parents, then the Head or the DSL will contact Milton Keynes Multi Agency Safeguarding Hub (MASH) for further advice. Failure to report a child absent in education regularly or where the child is absent without authorisation for a continuous period of 10 nursery days or more would be non-compliance with the duty to have regard to KCSIE (September 2025).



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### **13.3 Child Sexual Exploitation (CSE)**

CSE is a form of child sexual abuse (see above) which occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in sexual activity. It may involve an exchange for something the victim needs or wants (for example, money, gifts or affection), and/or the financial advantage or increased status of the perpetrator or facilitator. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology. CSE can affect any persons (male or female) under the age of 18 years (including 16 and 17 year olds who can legally consent to have sex) who has been coerced into engaging in sexual activities. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media). 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.

The below CCE indicators can also be indicators of CSE, as can:

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

The DfE has published guidance on this entitled "*Child sexual exploitation: guide for practitioners*". The Children's Society and Home Office has also published guidance on Preventing Child Sexual Exploitation.

CSE may occur alone, or may overlap with CCE, and/or county lines, as well as other forms of abuse.

### **13.4 Child Criminal Exploitation (CCE)**

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into taking part in any criminal activity. It may involve an exchange for something the victim needs or wants (for example, money, gifts or affection), and/or (for the financial or other advantage (such as increased status) of the perpetrator or facilitator and/or through violence or the threat of violence. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines, see below), forced to shoplift or pickpocket. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.



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Children can become trapped by this type of exploitation 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.

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, their vulnerability as victims is not always recognised by adults and professionals (especially when they are older children). It is important in these circumstances that the child perpetrator is also recognised as a victim.

Some of the following can be indicators of CCE:

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

The experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however staff should be 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.

CCE may occur alone, or may overlap with CSE, and/or county lines, as well as other forms of abuse.

Children who have been exploited will need additional support to help maintain them in education.

### **13.5 Female Genital Mutilation (FGM)**

As the nursery has female children, when a member of staff discovers that an act of FGM appears to have been carried out, they must immediately report this to the DSL. It is mandatory for the DSL to inform the Police. Milton Keynes Multi Agency Safeguarding Hub (MASH) will be involved as appropriate.

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs.<sup>238</sup> Guidance on the warning signs that FGM may be about to take place, or may have already taken place, can also be found on pages 38-41 of the Multi-agency statutory guidance on FGM. To give an example of indications that a girl has already been subjected to FGM:

- A child may have difficulty walking, sitting, or standing and may even look uncomfortable.
- A child may have frequent urinary, menstrual or stomach problems or spend longer than normal in the bathroom due to difficulties urinating.
- There may be prolonged or repeated absences from Nursery and/or noticeable behaviour changes (e.g. withdrawal or depression) on the child's return.
- A child is reluctant to undergo medical examination.

There is a statutory duty on nursery managers to personally 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.



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Unless the nursery manager has a good reason not to, they should still consider and discuss any such case with the DSL and involve children's social care as appropriate. If the nursery manager is unsure whether this reporting duty applies, they should discuss their concerns with the DSL in accordance with this policy. Where a nursery manager suspects that a child is at risk 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 teachers should follow the Nursery's local safeguarding procedures.

### **13.6 Online Safety, including Filtering and Monitoring**

The nursery ensures that robust monitoring and filtering systems are in place to safeguard children online. All devices on the nursery premises are networked and do not use 3G, 4G or 5G to establish a connection to the internet. This is to protect children from:

- Being exposed to inappropriate, harmful, extremist or illegal material.
  - Being subjected to harmful online interactions with other users.
  - Potentially harmful online behaviour that may expose them to harm.
- and help manage online behaviour that can increase a child's 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 photography, sharing other explicit images and online bullying (**conduct risk**);
  - restrict access to online risks such as online gambling, inappropriate advertising, phishing or financial scams (**commerce risk**).

what their children are being asked to do online when undertaking remote learning, including the sites they will be asked to access and who from the Nursery their child is going to be interacting with online.

Access to the Internet is only permitted during lesson-time and is always supervised by a member of staff.

Children are not allowed to bring mobile phones or any other electronic device with imaging and sharing capabilities into nursery. They are however, taught about the safe use of these devices during IT and PSHE lessons, assemblies and during form time.

- Please refer to the separate document: *Policy for Online Safety*.
- Please refer to the separate document: *Acceptable Use of Technology Policy*
- Please refer to The UK Safer Internet Centre ([https:// https://saferinternet.org.uk/guide-and-resource/teachers-and-nursery-staff/appropriate-filtering-and-monitoring](https://saferinternet.org.uk/guide-and-resource/teachers-and-nursery-staff/appropriate-filtering-and-monitoring))
- Please refer to DfE Generate AI: *Product Safety Expectations*
- Please refer to DfE guidance on 'Plan Technology for your Nursery'

### **13.7 One to One Teaching**

When children receive one-to-one specialist teaching, for example, music lessons or dyslexia coaching, the child will be collected from their class with the permission of the class teacher. The nursery gives special attention to the safeguarding of children arrangements where certain children are engaged in one-to-one teaching.



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### **13.8 Prevent Awareness (Radicalisation)**

The nursery will adhere to the obligations and guidance from the Prevent Duty Guidance: for England and Wales (Dec 2023). Protecting children from the risks of radicalisation is part of the nursery's wider safeguarding duties. Radicalisation refers to the process by which a person comes to support terrorism and other of extremism. The nursery will build children's resilience to radicalisation by promoting fundamental British Values throughout the curriculum and through the provision of PSHE, circle time and assemblies.

It is essential that staff are able to identify children who may be vulnerable to radicalisation and know what to do when they are identified. Staff should be alert to changes in behaviour in children that may indicate that the child might be in need of help or protection. Where a staff member identifies a concern, then the staff member must consult with the DSL.

**Extremism** is the vocal or active opposition to our fundamental 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.

There is no single way of identifying whether a child is likely to be susceptible to radicalisation into terrorism, there are factors that may indicate concern. However, it is possible to protect people from extremist ideology and intervene to prevent those at risk of radicalisation being drawn to terrorism. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be susceptible and act proportionately, which may include making a Prevent referral.

The DSL/DDSL's have familiarised themselves with the revised Prevent duty guidance: for England and Wales especially paragraphs 141-210, which are specifically concerned with education. Staff should contact the DSL or the DDSL, who will be aware of the local procedures in place, before making a Prevent referral.

In the event of a child leaving, the DSL should consider if it would be appropriate to share any information with the new nursery or college. For example, information that would allow the new nursery or school to continue supporting victims of abuse or those who are currently receiving support through the 'Channel' programme and have that support in place for when the child arrives at the new nursery.

**Special educational needs and/or disabilities (SEND), or children with certain health conditions:** Children with SEND or certain health conditions can face additional safeguarding challenges. These children may not outwardly show signs of abuse and/or may have difficulties in communication about abuse or neglect, or bullying. These can include:



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- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration;
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;
- the potential for children with SEND or certain health conditions being disproportionately impacted by behaviours such as peer group isolation or bullying (including prejudice-based bullying), without outwardly showing any signs;
- communication barriers and difficulties in managing or reporting these challenges.
- being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in Nursery or the consequences of doing so.

When there are significant concerns about a child, the DSL may seek advice and/or make a referral to the most appropriate body, either Channel, Children's Social Care or Milton Keynes Multi Agency Safeguarding Hub (MASH). Further contacts are provided in Appendix 1.

The Prevent Duty requires the nursery to ensure that any visiting speakers are suitable and appropriately supervised. A member of staff will always be present when any visiting speaker addresses children. It is the responsibility of the member of staff inviting the visitor, to ensure that references are sought prior to the visit and that the member of staff is assured as to the suitability of the speaker to address children.

### **13.9 Taking Photographs of Children**

The nursery will use photographs as a way to share and celebrate achievements in nursery. Parents will themselves often enjoy seeing their children's photographs in nursery. The nursery wishes to ensure that everyone can continue to enjoy these activities safely. Only nursery cameras and phones are to be used to take photographs of approved activities in nursery. Personal Mobile phones or any other electronic devices with imaging and sharing devices are not to be used.

- *Please refer to the separate document: Policy on Taking, Storing and Using Images of Children.*

### **13.10 Use of Mobile Phones or any other electronic devices with imaging and sharing devices**

Mobile phones provide staff with important contact with their families and, therefore, it is accepted that staff will have the devices in nursery. However, they must only be used in the staff room and restricted office areas.

Parents are requested not to use their mobile phones or any other electronic devices with imaging and sharing devices in nursery.

- *Please refer to the separate document: Mobile Phone Policy.*

### **13.11 Domestic Abuse**

The Domestic Abuse Act 2021 introduces a statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear, or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members.



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The definition captures a range of different abusive behaviours, including but not limited to, psychological, sexual, physical, emotional, and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be “personally connected” (as defined in section 2 of the 2021 Act).

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 gender, age, ethnicity, socio- economic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government will issue statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children.

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, a child 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 child on child 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.

Domestic abuse may lead to other safeguarding concerns and should therefore be managed under this policy.

**Operation Encompass:** operates in all police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when the police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the DSL/DDSL) in nursery before the child or children arrive at nursery the following day. This ensures that the nursery has up to date relevant information about the child’s circumstances and can enable immediate support to be put in place, according to the child’s needs.

Operation Encompass does not replace statutory safeguarding procedures. Where appropriate, the police and/or nurseries should make a referral to local authority children’s social care if they are concerned about a child’s welfare.

More information about the scheme and how schools can become involved is available on the Operation Encompass website. Operation Encompass provides an advice and helpline service for all staff members from educational settings who may be concerned about children who have experienced domestic abuse.

### **13.12 Gangs**

All staff should be alert to any changes in a child’s behaviour which give cause for concern, including anti-social behaviour and indicators that the child may be exposed to or involved in gang-related activity. If a member of staff identifies any person or child to be at risk, they should immediately inform the DSL, who will then follow guidance provided by the MKTP.



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### **13.13 Serious Violence**

All staff should be aware of indicators which may signal that children are at risk from, or are involved with serious violent crime such as knife or gun crime and homicide. These may include increased absence from nursery, 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 CCE.

A range of risk factors increase the likelihood of involvement in serious violence. These include;

- being male;
- having been frequently absent or permanently excluded from nursery;
- having experienced child maltreatment;
- having been involved in offending, such as theft or robbery.

Early intervention is about recognising and responding to the indicators of potential vulnerability, providing early support that is effective. When a young person begins to show signs of exploitation or vulnerability to exploitation, and thus at increased risk from serious violence, we should be able to intervene as early as possible to help reduce the risk factors and increase the protective factors.

### **13.14 Forced Marriage**

Forcing a person into a marriage is a crime in England and Wales. 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.<sup>243</sup> 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 communities use religion and culture as a way to coerce a person into marriage. Since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their 18<sup>th</sup> birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

Nurseries and schools can play an important role in safeguarding children from forced marriage. There are a range of potential indicators that a child may be at risk of forced marriage, details of which can be found in the *Multi-agency guidelines: Handling cases of forced marriage (last updated April 2023)* Further information on forced marriage is available in guidance published on gov.uk and by the Forced Marriage Unit. Nursery staff can also contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email [fm@fcdo.gov.uk](mailto:fm@fcdo.gov.uk).

### **13.15 Honour based violence (HBV)**

Honour based violence involved incidents or crimes carried out to protect the honour of the family and/or the community and can include female genital mutilation (see Section 13.5) and breast ironing. Such honour-based violence can often involve the wider family or community. Staff will be alert to any child being at risk of honour based violence and will treat any such risk as a safeguarding concern and report their concerns to the DSL immediately. The DSL will follow guidance provided by the MKTP.



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### **13.16 Upskirting**

Upskirting is a criminal offence and typically involves taking 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. Anyone of any sex can be a victim.

### **13.17 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 exploited to sell drugs and move and store 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 schools (mainstream and special), further and higher educational institutions, child referral units, children's homes and care homes. Children are 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 ways of identifying 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 (from nursery or home) and are subsequently found in areas away from their home;
- that have been the victim, perpetrator or alleged 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;
- have their bank accounts used to facilitate drug dealing.

Further information on the signs of a child's involvement in county lines is available in guidance published by the Home Office and The Children's Society County Lines Toolkit For Professionals.

If a member of staff identifies any person or child to be at risk, they should immediately inform the DSL, who will then follow guidance provided by the MKTP.

### **13.18 Child Abduction and Community Safety Incidents**

Child abduction is 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.



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Other community safety incidents in the vicinity of a nursery can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

### **13.19 Children and the Court System**

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age-appropriate guides to support children [5-11-year olds](#) and [12-17 year olds](#).

The guides explain each step of the process, support and special measures that are available.

### **13.20 Children with Family Members in Prison**

Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The National Information Centre on Children of Offenders, [NICCO](#) provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

### **13.21 Modern Slavery and the National Referral Mechanism**

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.

Further 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 National Referral Mechanism is available in the statutory guidance *“Modern slavery: how to identify and support victims (June 2025)”*.

### **13.22 Cybercrime**

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:

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), should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests. Cyber Choices does not currently cover ‘cyber-enabled’ crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

Additional advice can be found at: Cyber Choices, ‘NPCC- When to call the Police’ and National Cyber Security Centre – [NCSC.gov.uk](#).



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### **13.23 Channel**

Channel is a voluntary, 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. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from the nursery may be asked to attend the Channel panel to help with this assessment. An individual's engagement with the programme is entirely voluntary at all stages. The designated safeguarding lead will consider if it would be appropriate to share any information with the new nursery or school in advance of a child leaving.

### **13.24 Homelessness**

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Children's social care will be the lead agency for these children and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances.

### **13.25 Organisations or Individuals using Nursery Premises**

Any allegation received relating to an incident that may happen when an individual or organisation is using the nursery premises for the purposes of running activities for our children will be dealt with in line with the nursery's safeguarding policies and procedures, including informing the LADO as we would do with any safeguarding allegation.

### **13.26 Contextual Safeguarding**

Contextual Safeguarding is an approach to understanding, and responding to, young people's experiences of significant harm beyond their families. The nursery recognises that the different relationships young people form in their neighbourhoods, nurseries and online can feature violence and abuse. We understand parents/guardians have little influence over these contexts, and young people's experiences of extra-familial abuse can undermine parent/child relationships. The nursery will share as much information with local agencies as possible as part of the referral process to enable consideration of all the available evidence and the full context of any abuse. Contextual Safeguarding expands the objectives of child protection systems in recognition that young people are vulnerable to abuse in a range of social contexts.

All staff, but especially the DSL and DDSL's, will consider the context within which such incidents and/or behaviours occur.

### **13.27 Early Help**

Any child may benefit from early help, but all staff should be particularly 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 as association with organised crime groups or county lines
- Is frequently missing/goes missing from education, home or care



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- Has experienced multiple suspensions, is at risk of being permanently excluded from nurseries, or in Alternative Provision or a Child Referral Unit
- Is misusing drugs and other alcohol themselves
- Is at risk of modern slavery, trafficking, and/or sexual or criminal exploitation
- Is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse
- Is at risk of being radicalised or exploited
- Has a parent or carer in custody, or is affected by parental offending
- Is a privately fostered child
- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage

Early help is providing help and support to meet the needs of children, of all ages, as soon as problems emerge. Early help improves resilience and outcomes or reduces the chance of a problem getting worse. Early help may be appropriate for children who have several needs, or whose circumstances might make them more vulnerable.

The Nursery has effective measures in place to identify emerging problems and potential unmet needs of individual children. All staff undertake appropriate training to ensure that they know when to share information with other agencies and what action to take to support early identification and assessments.

In the first instance, staff identify a child who may benefit from early help will discuss this with the DSL. If appropriate, the DSL will work with the Children's Social Care or Milton Keynes Multi Agency Safeguarding Hub (MASH) to undertake an assessment of the need for early help. The DSL will support staff in liaising with external agencies and professionals in an inter-agency assessment, as appropriate.

Further guidance on effective assessment of the need for early help can be found in Working Together to Safeguard Children (December 2023) ("WT").

If early help is appropriate, the matter will be kept under review and consideration given to a referral to children's social care if the child's situation does not appear to be improving.

### **13.28 Mental Health**

The Nursery has an important role to play in supporting the mental health and wellbeing of its children. 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.

All staff should be 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.

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, exploitation and neglect, or potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences can impact on their mental health, behaviour, attendance and progress at nursery.



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If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following this policy, and speaking to the DSL {or DDSL}.

Staff can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies. More information can be found in the DfE *Mental Health and Behaviour in Schools* guidance.

### **13.29 LGB or Gender Questioning**

A child or young person being lesbian, gay, or bisexual is not in itself an inherent risk factor for harm, however, they can sometimes be targeted by other children. In some cases, a child who is perceived by other children to be lesbian, gay, or bisexual (whether they are or not) can be just as vulnerable as children who are.

However, the Cass review identified that caution is necessary for children questioning their gender as there remain many unknowns about the impact of social transition and children may well have wider vulnerabilities, including having complex mental health and psychosocial needs, and in some cases additional diagnoses of autism and/or attention deficit hyperactivity disorder.

When supporting a gender questioning child, the Nursery will take a cautious approach and consider the broad range of the children's individual needs, in partnership with the parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying. The Nursery will adopt (to the extent that it is reflected in *KCSIE*), the draft DfE guidance for schools and colleges in relation to Gender Questioning Children, when deciding how to proceed.

Risks can be compounded where children lack trusted adults with whom they can be open. The Nursery endeavours to reduce the additional barriers faced and create a culture where they can speak out or share their concerns with members of staff.

### **14 THE USE OF RESTRAINT**

Nursery has clear and precise policy on using the restraint on children on the premises of the nursery and during nursery hours and will only use reasonable force and when applicable as per DfE guidance on 'Use of Reasonable force', 2013. Physical contact with children may occur under other circumstances such as providing physical prompts, giving support in PE and supplying reassurance.

The term restraint does not extend to these situations. Staff should not be inhibited in providing such contact when it is professional and appropriate to do so. Nursery will never use force as a punishment. It is always unlawful to use force as a punishment.

As per the DfE guidance, locking children in rooms for any reason (including child or staff safety) is potentially illegal; it is not just a breach of the standards. The use of isolation booths/units has also been found potentially to give rise to safeguarding and human rights issues.

- Please refer to the separate document: *Restraint Policy*.



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### **15 SUPPORTING CHILDREN**

Staff are trained to listen to children and be alert to any signs and symptoms which could indicate that a child needs early help. Early help means providing support as soon as a problem emerges at any point in a child's life. Early intervention can also help prevent problematic, abusive and/or violent behaviour in the future. (KCSIE: September 2025).

The nursery recognises that disabled children and children with special educational needs may face additional safeguarding challenges. Therefore, the nursery will review and undertake regular monitoring of these children.

Children who have suffered or are likely to suffer significant harm will be referred immediately to the Milton Keynes Multi Agency Safeguarding Hub (MASH) and the nursery will follow Milton Keynes Multi Agency Safeguarding Hub (MASH) procedures. Where decisions to seek support for a child in need or at risk would normally be taken in consultation with parents, no consent is required for a referral when there are reasonable grounds to believe that a child may be at risk of significant harm.

Where a child needs additional support from one or more agencies, the nursery will invoke inter-agency assessment using local inter-agency procedures:

- The Common Assessment Framework (CAF) is designed to enable early and effective assessment of children who might need additional support.
- The Multi Agency Referral Form (MARF) is designed to enable a non-urgent referral to be made to the Multi Agency Safeguarding Hub (MASH).

Where Child Protection or Child in Need procedures are invoked, the nursery will follow inter-agency practices and recommendations from the MKTP with regard to specific support to be put in place by the nursery for the child.

Where a child is identified as being at risk of radicalisation, the DSL will identify the most appropriate source of support for the child and the family. This could be via Channel or Multi Agency Safeguarding Hub (MASH). The relevant contacts are contained in Appendix 1.

#### **15.1 Looked After Children**

The nursery will ensure that staff have the skills, knowledge and understanding necessary to keep safe any children on roll who are looked after, or have been looked after, by the local authority.

This would include ensuring that a designated member of staff has responsibility for their welfare and progress and has up-to-date assessment information from the relevant local authority, the most recent care plan and contact arrangements with parents, and delegated authority to carers.

The nursery currently has 0 children on roll who are classed as looked after children.

The nursery shall refer to Government Statutory Guidance: Promoting the education of looked-after and previously looked-after children when dealing with looked after children.



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### **15.2 Children with Special Educational Needs and Disabilities**

Children with special educational needs and disabilities (SEND) can face additional safeguarding challenges, including particular vulnerability to child-on-child abuse. Staff must be alert to the fact that additional barriers can exist when recognising abuse and neglect in this group of children. These may include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further explanation;
- Being more prone to peer group isolation than other children;
- The potential for children with SEN and disabilities to be disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- Communication barriers and difficulties in overcoming these barriers.

To address these additional challenges, children with SEND may require extra pastoral support. The additional vulnerabilities of children with SEND and the nursery's duty to make reasonable adjustments should be particularly carefully considered in situations where the use of reasonable force may be needed in response to risks presented by incidents involving children with SEND or medical conditions.

### **16 STRESS AND MENTAL WELLBEING**

The Nursery is committed to providing a system to support good mental health for all children and to help minimise and alleviate stress and poor mental health. It is the nursery's intention to deal constructively and sympathetically with stress and poor mental health. Stress or poor mental health will not be treated as a sign of weakness.

We believe that all staff have a responsibility to promote positive mental health, and to understand about protective and risk factors for mental health. Some children will require additional help and all staff should have the skills to look out for any early warning signs of mental health problems and ensure that children with mental health needs get early intervention and the support they need.

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

All staff also understand about possible risk factors that might make some children more likely to experience problems, such as: physical long-term illness, having a parent who has a mental health problem, death and loss, including loss of friendships, family breakdown and bullying. They should also understand the factors that protect children from adversity, such as self-esteem, communication and problem-solving skills, a sense of worth and belonging and emotional literacy.

Through PSHE the nursery teaches knowledge and social and emotional skills that will help children to be more resilient, understand about mental health and be less affected by the stigma of mental health problems.

All concerns are reported to the Head of EYFS, Mrs Nicola Wilson, and recorded. The nursery will then assess each concern on a case by case basis and ensure that children get the support they need, either from within the Nursery or from an external specialist service.

The nursery's aim is to put in place interventions as early as possible to prevent problems escalating.



## **SAFEGUARDING AND CHILD PROTECTION POLICY**

The nursery also recognises that support for mental health and wellbeing is equally important for members of staff and staff trained in Mental Health First Aid are listed in Annex 1

### **17 SUPPORTING STAFF**

Staff working in the nursery who have become involved with a child who has suffered harm or appears to be likely to suffer harm may find the situation stressful and upsetting. The nursery will support such staff by providing an opportunity to talk through their anxieties with the Head, DSL or DDSL and to seek further support.

Staff are also made aware of guidance to ensure that their behaviour and actions do not place children or themselves at risk of harm or of allegations of harm to a child (for example, in one-to-one tuition, performing arts, sports coaching, conveying a child by car, engaging in inappropriate electronic communication with a child, and so on).

- *Please refer to separate document: Code of Conduct Policy*

### **18 CONFIDENTIALITY**

The nursery recognises that all matters regarding the safeguarding of children are confidential.

- The Head, the DSL and or DDSLs will disclose personal information about a child to other members of staff on a need to know basis only.
- All staff have a professional responsibility to share information with other agencies in order to safeguard children, following MKTP inter-agency protocols for communication.
- All staff must not promise a child to keep any secrets that may compromise the child's safety or well-being or that of another child.
- Staff must not promise a child confidentiality when a child raises a safeguarding concern with them.
- The nursery will always undertake to share its intention to refer a child to the Milton Keynes Together Partnership (MKTP) with their parent's/carer's permission, unless to do so, could put the child at greater risk of harm, or impede a criminal investigation.
- A member of staff who reports another member of staff for inappropriate behaviour is entitled to have his/her name protected from being disclosed by the Head of EYFS to the alleged perpetrator, without his/her prior approval. However, it has to be recognised that his/her evidence may be required by the Police to be used in any criminal proceedings.

### **19 DESIGNATED SAFEGUARDING LEAD**

Mrs Nicola Wilson, member of the Senior Management Team, is the Designated Safeguarding Lead (DSL) and has overall responsibility and sufficient independence for the nursery's safeguarding, prevent and online/offline safety responsibilities including an understanding of the filtering and monitoring systems and processes in place at the nursery. The DSL undergoes refresher training every two years.

The DSL's responsibility is to maintain an overview of safeguarding, manage referrals, prevent and on-line practices within the nursery, to open channels of communication with local agencies (including the local authority children's services, the DBS, Channel and the Police) and to support staff in carrying out their safeguarding duties to monitor the effectiveness of policies and procedures in practice, share relevant information where necessary, keep child protection files up to date, advise on training requirements and raise awareness when necessary. The DSL will also take lead responsibility for online safety and understanding the filtering and monitoring systems and processes the Nursery have in place. The DSL works with the proprietorial body to review and update the Nursery's safeguarding policy.



## **SAFEGUARDING AND CHILD PROTECTION POLICY**

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Safeguarding and Prevent concerns for children should be referred, in the first instance, to Mrs Wilson, as the DSL. If Mrs Wilson is away from the nursery site, during normal nursery hours, she can be contacted via the nursery telephone number, 01908 678403 or [nwilson@mkps.co.uk](mailto:nwilson@mkps.co.uk). In the absence of Mrs McLaughlan, safeguarding concerns should be referred to DDLS Mrs Chantelle McLaughlan. In the absence of Mrs McLaughlan, safeguarding concerns should be referred to the DDSLs as follows: Mrs Bolt or Miss Johnson.

The DSL and DDSLs receive updated child protection training every two years. All training will be in line with the local requirements and will include local inter-agency working protocols and training in Prevent duties.

The DSL is aware of the requirement for children to have an Appropriate Adult in relation to ongoing enquiries under Section 47 of the Children Act 1989 and police investigations.

The DSL is aware of the provisions relating to the role in KCSIE September 2025 – Annex C

The Designated Safeguarding Lead and Deputies are named in Appendix 1.

Where a child leaves the Nursery, including for in-year transfers, the DSL will also ensure their child protection file is transferred to the new nursery or school (separately from the main child file) as soon as possible and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. The DSL will ensure secure transit and obtain confirmation of receipt. In addition to the child protection file, the DSL should also consider if it would be appropriate to share any additional information with the new nursery in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the setting.

Access to the nursery's records on Child Protection is restricted to the Head, the DSL and other DDSLs.

### **20 EARLY YEARS FOUNDATION STAGE**

The Nursery adheres to the requirements set out in the EYFS Statutory Framework including the requirements regarding paediatric first aid training, safer eating and children's privacy in relation to toileting and nappy changes.

The DSL with the lead responsibility for safeguarding is Mrs Nicola Wilson, Head of EYFS.

The DSL with the lead responsibility for the EYFS recognises that specific guidance for staff that teach in the EYFS is required. All EYFS staff are made aware of the nursery's safeguarding policy and procedures and regular staff training enables staff to identify signs of abuse and respond in a timely and appropriate way.

The Nursery will inform Ofsted of any significant event which is likely to affect the suitability of any person who is in regular contact with children on the premises where childcare is provided. For example, where the Nursery is satisfied that a person working in a relevant setting falls within one of the disqualification criteria. Any significant event must be notified to Ofsted as soon as reasonably practicable, but at the latest within 14 days of the date the Nursery became aware (or ought reasonably to have become aware) of it.

The Nursery will notify Ofsted within 14 days of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere).



## **SAFEGUARDING AND CHILD PROTECTION POLICY**

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The nursery has very specific guidelines on the use of mobile phones or any other electronic devices with imaging and sharing devices in the nursery. Staff are not permitted to use their mobile phone or any other electronic devices with imaging and sharing devices while in the presence of children nor are they permitted to take photographs of children with their mobile phones. Only nursery cameras may be used for that purpose.

In line with current EYFS statutory requirements at least one member of staff, on our premises, will hold an up to date paediatric first aid certificate when children are present. We also ensure that at least one member of staff present on all nursery trips holds an appropriate paediatric first aid certificate.

All EYFS staff who are Level 2 and/or Level 3 qualified since June 2016 will hold a valid paediatric first aid (PFA) certificate. Certificates are made available to parents if requested.

The Nursery ensures staff are trained in line with the criteria set out in Annex C of the EYFS Statutory Framework 'Criteria for effective safeguarding training' and are supported to implement the Policy on an ongoing basis.

The DSL provides support, advice and guidance to all staff on an ongoing basis, and on specific safeguarding issues that may arise. The DSL attends a training course, consistent with the criteria set out in Annex C of the EYFS Statutory Framework.

The Nursery's safeguarding training will be renewed every year to ensure staff keep up to date with changes to safeguarding procedures or as a result of any safeguarding concerns that may occur at the nursery.

- Please refer to the separate document: *Mobile Phone Policy*.
- Please refer to the *First Aid Policy*
- Please refer to the separate document: *Policy on Taking, Storing and Using Images of Children*.

### **21 SAFER RECRUITMENT**

The nursery is committed to safer recruitment processes which create a culture that safeguards and promotes the welfare of children in the nursery, whilst deterring and preventing people who are unsuitable to work with children from applying for securing employment, or volunteering opportunities, with the nursery. Appropriate safer recruitment checks and procedures are applied to any member of staff employed by the nursery before they begin their employment. This will include any staff employed by another organisation and working with the nursery's children in nursery or on any other site.

All potential candidates are made aware that references will be taken up prior to appointment and that it is an offence to apply for any post if the applicant is barred from engaging in regulated activity with children. All applicants will also be referred to the nursery's Safeguarding and Child Protection Policy which can be located on the nursery's website and made available during induction.

All candidates will be made aware that we will consider carrying out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online. Shortlisted candidates will be informed that we will carry out these checks as part of our due diligence process.

All members of staff will be supervised at all times until all Disclosure and Barring Service (DBS) checks have been completed.



## **SAFEGUARDING AND CHILD PROTECTION POLICY**

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All new teaching staff will be Prohibition from Teaching checked.

All staff appointed to a management position from 12 August 2015 will be subject to a Prohibition from Management Check. This applies to internal appointments as well as external appointments.

All necessary staff details and recruitment checks will be entered onto the nursery's Single Central Record (SCR) and will be reviewed regularly by the nursery's senior management team, including the Proprietorial Body, Head of EYFS and Chair of Governors.

Members of the Senior Management Team and the HR Manager have completed a course on Safer Recruitment. At least 1 person conducting any interview for any post at the nursery will have undertaken safer recruitment training.

- *Please refer to the separate document: Safer Recruitment Policy.*

### **21.1 Disqualification under the Childcare Act 2006**

The nursery will not knowingly employ people to work in the setting or be directly concerned with its management if they themselves are directly disqualified from childcare.

Where staff work in, or are involved in the management of, the Nursery's early years or provision of care of children under the age of eight, the Nursery will take steps to check whether those staff are disqualified under the Childcare Act 2006.<sup>201</sup> These checks will be undertaken pre-appointment, and from time to time during employment. This forms part of the Nursery's safer recruitment practices, further details of which can be found in the Nursery's Safer Recruitment Policy.

The Nursery records all checks of staff employed to work in or manage relevant childcare on SCR (single Central Register). This includes the date disqualification checks were completed.

Where a member of staff is found to be disqualified or if there is doubt over that issue then, pending resolution, the Nursery will remove them from the work from which they are or may be disqualified. Suspension or dismissal will not be an automatic response; the Nursery will consider if there is scope in principle to redeploy them with other age groups or in other work from which they are not disqualified, subject to assessing the risks and taking advice from the LADO when appropriate.

### **21.2 Arrangements for Visiting Speakers**

The Nursery has clear protocols for ensuring that any visiting speakers are appropriately supervised and suitable. The Nursery's responsibility to children is to ensure that they can critically assess the information they receive as to its value to themselves, and that the information is aligned to the ethos and values of the Nursery and the British values of democracy.

Visiting speakers, whether invited by staff or by the nursery's children themselves, shall be suitably and appropriately supervised at all times whilst on the nursery premises (*Prevent*). Checks on visiting speakers will include obtaining approval by the Head of EYFS, with a clear understanding of why the speaker has been chosen. The nursery will also conduct appropriate checks on the suitability of the person, which may include internet searches and/or contacting other nurseries where the person may have spoken previously. A Visiting Speaker Risk Assessment and Agreement will be completed and received prior to the visitor being onsite.



## **SAFEGUARDING AND CHILD PROTECTION POLICY**

Visiting speakers will be expected to understand that, where appropriate, their session should actively promote the British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs and at no point undermine these. In some cases, the Nursery may request a copy of the Visiting Speaker's presentation and/or footage in advance of the session being provided.

Visiting Speakers, on attending the Nursery, will be required to show original current identification documents including a photograph such as a passport or photo card driving licence.

### **22 TRAINING**

#### **22.1 Induction Training**

Every new member of staff receives induction training on their responsibilities to be alert to the signs of abuse, neglect, exploitation and bullying. They will be informed of the names of the DSL and DDSLs to whom any safeguarding concerns should be referred. They will also receive induction training on the procedures for recording and referring any safeguarding concerns to the DSL and/or DDSLs.

During induction, new employees will be given copies of the following:

- Keeping Children Safe in Education Part 1 and Annex B: Further Information (September 2025)
- The Safeguarding and Child Protection Policy (including online and offline safety and Children who are absent from Education (CME) and the names of the nursery's Designated Safeguarding Lead and the DDSLs.
- The nursery's Code of Conduct for Staff.
- The nursery's Whistleblowing Policy.
- The nursery's Behaviour, Sanctions and Rewards Policy
  
- Fire and Emergency Evacuation Procedures
- Health and Safety
- Anti-Bullying Policy
- Mobile Phone Policy – Staff are allowed to bring their personal phones to nursery for their own use but must limit such use to non-contact time when children are not present. Staff understand they must not take pictures or recordings of children on their personal phones or cameras.

#### **22.2 Training for the Heads, the DSL and DDSLs**

The Head of EYFS, the DSL, DDSLs and the Chair of Governors attend refresher training in safeguarding and child protection and Prevent awareness training every two years (as determined by the MKTP), covering the following areas:

- The assessment process for providing early help and intervention.
- The MKTP practices for child protection case conferences and child protection review conferences and how to contribute effectively to these.
- Inter-agency working practices.
- How to support children in need or at risk.
- Online and offline safety, including an understanding of the filtering and monitoring systems and processes in place.
- Identifying children at risk of radicalisation (prevent)
- Record keeping protocols.



## **SAFEGUARDING AND CHILD PROTECTION POLICY**

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- Continuing to ensure that the nursery culture is one based on listening to children and taking account of their wishes and feelings.
- Understanding the impact on a child of adversity and trauma and how to promote educational outcomes in response to it.

As the local authority develops its services to support the Prevent Duty, it is anticipated that the DSL and DDSLs will undergo higher levels of training on how to be able to assess the risk of children being drawn into terrorism, including being drawn into support for extremist views.

The DSL and DDSLs are given copies of KCSIE (September 2025) including Annex: Further Information, Annex C: Role of the Designated Lead.

The Head of EYFS will ensure that the DSL and DDSLs are given sufficient time, funding and supervision to fulfil their safeguarding responsibilities effectively.

### **22.3 Staff Training**

All members of staff, including part time, regular contractors and visitors, receive annual safeguarding training, prevent and on-line safety awareness training annually in order to:

- Develop their understanding of the Safeguarding and Child Protection Policy.
- Recognise the differences between a safeguarding concern and a child who is at risk of immediate harm.
- Understand online safety, including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring.
- Recognise the signs and symptoms of abuse at the earliest opportunity. This includes:
  - Significant changes in a child's behaviour.
  - Signs of deterioration in a child's well-being.
  - Unexplained bruising, marks or other sign of possible abuse, neglect and exploitation.
  - Parent comments which may give cause for concern.
  
  - Any reasons to suspect abuse, neglect and exploitation outside the nursery setting, for example, the child's home.
  - Understanding the particular vulnerabilities of children with special educational needs and/or disabilities (SEND) who are at risk of greater harm.
  - Child on child sexual violence and sexual harassment.
  - Inappropriate behaviour displayed by staff or other persons working with children, for example, inappropriate sexual comments, excessive one-to-one attention beyond that which would be expected in the role or sharing of inappropriate images.
  - To not promise confidentiality, to listen, to be non-judgemental, not lead, takes notes and report to the DSL or one of the DDSLs.
- Identify children who may be at risk of being exposed to extremism, how to challenge extremist ideas and how to refer children for further help.

A Training Register is maintained which records the Basic Safeguarding Training, Prevent and On-Line Safety awareness training provided to staff.

Each time KCSIE is updated, staff will receive the updated version, to read and keep, along with Annex: Further Information.



## **SAFEGUARDING AND CHILD PROTECTION POLICY**

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Staff who have English as a foreign language may be provided with Annex A, the condensed version of Part 1.

The nursery will follow advice from the MKTP with regard to determining the most appropriate level and focus for safeguarding training for staff.

Staff are also made aware of guidance to ensure that their behaviour and actions do not place children or themselves at risk of harm or of allegations of harm to a child (for example, in one-to-one tuition, sports coaching, conveying a child by car, engaging in inappropriate electronic communication with a child, and so on).

Staff will also receive regular safeguarding and child protection updates, including on online safety, as required but at least annually (for example, through emails, e-bulletins and staff meetings).

The nursery considers the above training schedule to be of adequate frequency. However, the nursery will consult regularly with MKTP to determine the most appropriate schedule for training and will review annually, the level and focus of training required.

- *Please refer to the separate document: Code of Conduct for Staff.*

The Head of EYFS will ensure that staff have the skills, knowledge and understanding necessary to keep safe children who are looked after by a local authority. This will include ensuring the appropriate staff have up to date assessment information from the relevant local authority, the most recent care plan and contact arrangements with parents, and delegated authority to carers, and information available to the DSL and DDSLs.

The nursery will ensure that all staff working with children will have regular reviews of their own practice (*Annual Supervision Meetings/Performance Reviews*) and have opportunities to discuss any concerns they may have about safeguarding matters. This will include the personal and professional duty to report welfare and safeguarding concerns to the Head of EYFS and/or the DSL in the nursery, or, in their absence, directly to MKTP.

The nursery will ensure that all staff receive copies of the nursery's Safeguarding and Child Protection Policy when updated. Staff who do not have a clear understanding of the most recent version of KCSIE should seek further guidance from the Head who will in turn inform the DSL and have the member of staff re-train in the necessary areas.

### **23 TEACHING CHILDREN HOW TO KEEP SAFE**

Nursery children do not have access to the Internet.

### **24 REVIEW OF POLICIES AND PROCEDURES AND THE MANAGEMENT OF SAFEGUARDING**

The Proprietorial Body is responsible for ensuring that the Safeguarding and Child Protection Policy and procedures are reviewed annually. The review will ensure that the policy is up-to-date with any guidance and advice provided by the Independent Nurseries Standards Regulations, statutory regulations and MKTP policy and procedures and will consider the efficiency with which the child protection duties have been discharged.



## **SAFEGUARDING AND CHILD PROTECTION POLICY**

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The review will include the contribution to inter-agency working through effective communication and good cooperation with local agencies in line with 'Working Together to Safeguard Children' (December 2023) and KCSIE (September 2025). The review will be carried out in conjunction with the nominated Safeguarding Governor.

The Proprietorial Body understands that responsibility for the annual review cannot be delegated. However, the Proprietorial Body may make appropriate arrangements for the review to be carried out by suitable others. The review will then be reported to the Proprietorial Body, the Head of EYFS and the Chair of Governors.

The implementation of these policy provisions will be checked through discussion with the Proprietorial Body, the Head of EYFS and the DSL and by scrutiny of the minutes of Governor meetings and available evidence underpinning the review. The review will also take into account, but is not limited to:

- Any written report or information presented to Governors to support the review.
- Training records.
- Referral information in respect of requests for help and support for individual children.
- Issues and themes which may have emerged in nursery and how these have been handled.
- The contribution the nursery is making to multi-agency working in individual cases.
- Local discussions on safeguarding matters.

Information will be sufficiently detailed to demonstrate both breadth and depth of the review.

The Proprietorial Body and the Chair of Governors are responsible for overseeing the annual review and implementation of Safeguarding and Child Protection matters. They will carry out regular monitoring checks on safeguarding procedures and known practice amongst different cross sections of staff within the nursery to ensure that staff know who to go to in the case of suspected abuse and what they might do in terms of communicating with a child in this context.

Each time the Safeguarding/Prevent Duty Governor visits the nursery for this purpose, the findings will be recorded in written format and retained in the Safeguarding and Child Protection file.

The Proprietorial Body and the Chair of Governors are also responsible for:

- Approving amendments to safeguarding and child protection procedures in the light of changing regulations or recommended best practice.
- Ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development. Ensure all policies operate with the best interests of the child at their heart.
- Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly
- Ensuring children are taught on 'how to keep themselves and others safe'.
- Ensuring the DSL has the appropriate status and authority within the nursery to carry out the duties of the post, including taking lead responsibility for understanding the filtering and monitoring of systems in place as part of their role.
- Ensuring that any identified deficiencies or weaknesses in safeguarding and child protection procedures are immediately remedied.
- Ensuring the nursery works with the LADO to determine whether there are any improvements to be made to the nursery's procedures or practice following a substantiated allegation against a member of staff.



## **SAFEGUARDING AND CHILD PROTECTION POLICY**

- Ensuring the nursery's commitment to report promptly to the DBS any person (whether employed, contracted, a volunteer or student) whose services are no longer used because they are considered unsuitable to work with children. Ceasing to use a person's services includes: dismissal; non-renewal of a fixed-term contract; no longer engaging or refusing to engage a supply teacher provided by an employment agency; terminating the placement of a student teacher or other trainee; no longer using staff employed by contractors; no longer using volunteers; resignation and voluntary withdrawal from supply teaching, contract working, a course of initial teacher training or volunteering.
- The nursery will fully take the lead while keeping supply agencies fully informed and involved. In no circumstances will the nursery simply cease to use supply staff for safeguarding reasons.
- Ensuring staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children.
- Creating an environment where staff feel supported in their safeguarding role and able to raise concerns.
- Ensuring 'practitioners' (such as those who work directly with children) have regular reviews of their own practice so that they have knowledge, skills and experience which improve over time.
- Ensuring all governors receive regular, appropriate, safeguarding and child protection (including online and offline) training.
- Ensuring all staff undergo safeguarding and child protection training, including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring. Ensuring that such training is regularly updated and in line with advice from the safeguarding partners.
- Ensure the effectiveness of the nursery's online filters and monitoring systems in place, ensuring staff have an awareness and understanding of the provisions in place, including their expectations, roles and responsibilities and manage them effectively and know how to escalate concerns when identified.
- Ensuring online and offline safety is a running and interrelated theme whilst devising and implementing the whole nursery approach to safeguarding and related policies and procedures.
- Ensuring regular contact with parents/carers is kept regarding the importance of children being safe online and offline.
- Ensuring the review (at least annually) of the DfE's filtering and monitoring standards, and discuss this with IT staff and service providers about what needs to be done to support the nursery to meet these standards.
- Ensuring all governors are aware of all provisions of KCSIE (September 2025) Annex C.
- Ensuring all governors are aware of their obligations under the Human Rights Act 1998 (*in particular subjection to harassment, violence and/or abuse, including of a sexual nature*), the Equality Act 2010 (*supporting the children with regard to particular protected characteristics, given the need to not unlawfully discriminate against children because of any protected characteristic*) and their local multi-agency safeguarding arrangements.

The Proprietorial Body and the Chair of Governors understand that:

- Failure to make a report constitutes an offence and as a consequence could lead to the nursery being removed from the register of independent schools.
- 'Compromise agreements' cannot apply in this connection.
- The legal duty to respond to requests from the DBS for information that the nursery already holds and that the nursery does not have to find it from other sources.



## **SAFEGUARDING AND CHILD PROTECTION POLICY**

The nursery will follow appropriate regulations for all peripatetic teaching staff and shall ensure the necessary safeguarding checks, as detailed in the most recent Independent School Standards Regulations are actioned.

### **APPENDIX 1 CONTACTS**

#### **NURSERY CONTACTS**

- Designated Safeguarding Lead (DSL) and DSL for EYFS:**
- Mrs Nicola Wilson - Tel: 01908 678403 or email [nwilson@mkps.co.uk](mailto:nwilson@mkps.co.uk)
- Deputy Designated Safeguarding Leads (DDSLs):
  - Mrs Chantelle McLaughlan - Tel: 01908 678403 ([matron@waltonnursery.co.uk](mailto:matron@waltonnursery.co.uk))
  - Mrs Amanda Bolt - Tel: 01908 678403 ([abolt@waltonnursery.co.uk](mailto:abolt@waltonnursery.co.uk))
  - Miss Samantha Johnson - Tel: 01908 678403 ([sjohnson@waltonnursery.co.uk](mailto:sjohnson@waltonnursery.co.uk))
- Proprietorial Body:**
  - Mr Simon Driver, (CHAIR) Milton Keynes Preparatory Nursery, Tattenhoe Lane, Milton Keynes, MK3 7EG. Tel: 01908 642111
  - Mrs Hilary Pauley, Milton Keynes Preparatory Nursery, Tattenhoe Lane, Milton Keynes, MK3 7EG. Tel: 01908 642111
- Chair of Governors and nominated Safeguarding and Prevent Governor:**
  - Mr David Pye, c/o Milton Keynes Preparatory Nursery, Tattenhoe Lane, Milton Keynes MK3 7EG. Any correspondence should be marked as Strictly Confidential. Tel: 01908 642111.
- Prevent Officer:**
  - Mrs Nicola Wilson - Tel: 01908 678403 or email [nwilson@mkps.co.uk](mailto:nwilson@mkps.co.uk)
- Mental Health First Aid Trained Staff:**

#### **INTER-AGENCY CONTACTS**

Milton Keynes Council	01908 691691
MK Together Partnership	01908 253169/253170 <a href="mailto:mktogether@milton-keynes.gov.uk">mktogether@milton-keynes.gov.uk</a>
Multi-agency Safeguarding Hub (MASH)	01908 253169/70
Emergency Social Work Team (out of office hours)	01908 265545 <a href="mailto:children@milton-keynes.gov.uk">children@milton-keynes.gov.uk</a>
LADO:	01908 254307 <a href="mailto:lado@milton-keynes.gov.uk">lado@milton-keynes.gov.uk</a>

If the LADO is not available, refer to Multi-agency Safeguarding Hub (MASH) on  
01908 253169/253170.

## **SAFEGUARDING AND CHILD PROTECTION POLICY**



For further guidance please see the Milton Keynes local safeguarding partner MK Together Partnership (MKTP) website: [www.mktogether.co.uk](http://www.mktogether.co.uk)

### **OTHER CONTACTS**

DBS Barring (DBS), PO Box 3963, Royal Wootton Bassett, SN4 4HH.	03000 200 190
Internet Watch Foundation	<a href="http://www.iwf.org.uk">www.iwf.org.uk</a>
Independent Schools Inspectorate	0207 6000 100
Ofsted, Piccadilly Gate, Store Street, Manchester, M1 2WD	<a href="mailto:enquiries@ofsted.gov.uk">enquiries@ofsted.gov.uk</a>
Ofsted	0300 123 4666
NSPCC Helpline	0808 800 5000
NSPCC 18 or under	0800 1111
NSPCC Report Abuse in Education Advice Line	0800 136 663
NSPCC Whistleblowing Advice Line	0800 028 0285
Crimestoppers	0800 555 111
CEOP (Child Exploitation and Online Protection)	0800 1111/0808 800 5000
Child Exploitation and Online Protection Centre, 33 Vauxhall Bridge Road, London, SW1V 2W	
CEOP's Thinkuknow website	<a href="http://www.thinkuknow.co.uk">www.thinkuknow.co.uk</a>
Teacher Regulation Agency	0370 000 2288
The UK Safer Internet Centre	<a href="http://www.saferinternet.org.uk">www.saferinternet.org.uk</a>
LGFL Undressed	<a href="https://undressed.lgfl.net">https://undressed.lgfl.net</a>
Forced Marriage Unit	0207 008 0151 Or <a href="mailto:fmf@fco.gov.uk">fmf@fco.gov.uk</a>
Anti-Phishing Working Group	<a href="https://apwg.org/">https://apwg.org/</a>
Operation Encompass	0204 513 9990

### **The Prevent Duty:**

DfE Non-emergency advice for staff and governors	020 7340 7264
For local advice: <a href="mailto:preventreferrals@thamesvalley.pnn.police.uk">preventreferrals@thamesvalley.pnn.police.uk</a>	
<a href="mailto:counter.extremism@education.gov.uk">counter.extremism@education.gov.uk</a>	

Contact local police force on 999 (for emergencies or dial 101 (the non-emergency telephone number)



## **SAFEGUARDING AND CHILD PROTECTION POLICY**

### **APPENDIX 2 INDICATORS OF ABUSE, NEGLECT AND EXPLOITATION**

All nursery and college staff should be aware that abuse, neglect and exploitation and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

**ABUSE:** a form of maltreatment of a child. Somebody may abuse, neglect and exploitation 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. They may be abused by an adult or adults or by another child or children. Exploitation can include instances where a child or young person may be groomed to become involved in sexual or criminal activity.

**PHYSICAL ABUSE:** a form of abuse which may involve hitting, kicking, shaking, throwing, biting, hair pulling, 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.

**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 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 (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. Sexual abuse also includes sexual violence and sexual harassment (see below) which can occur between two children of any sex (also known as child on child abuse). This can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence are sexual offences under the Sexual Offences Act 2003, such as rape, sexual assault, and assault by penetration. Nurseries should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.

The Centre of Expertise on Child Sexual Abuse has introduced new resources to help education professionals identify and respond to concerns of child sexual abuse and abusive behaviours. There are also the below resources available:



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- Tackling Child Sexual Abuse Strategy – Home Office policy paper
- Together we can stop child sexual abuse – HM Government campaign

**SEXUAL HARASSMENT:** is ‘unwanted conduct of a sexual nature’ that can occur online and offline and both inside and outside of nursery. 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. 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; or upskirting, and sharing of unwanted explicit content (for example displaying pictures, photos or drawings of a sexual nature); and online sexual harassment, which might include consensual or non-consensual sharing of sexual images and videos (often referred to as the sharing of nudes/semi-nudes, or sexting – see below); inappropriate sexual comments on social media; exploitation; coercion and threats. Online sexual harassment may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence:

**SEXUAL VIOLENCE:** refers to sexual offences under the Sexual Offences Act 2003, including rape, assault by penetration, sexual assault, and/or causing someone to engage in sexual activity without consent. Consent to sexual activity may be given to one sort of sexual activity, but not another, or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. A child under the age of 13 can never consent to any sexual activity. The age of consent is 16, and sexual intercourse without consent is rape.

**CHILD-ON-CHILD SEXUAL VIOLENCE AND/OR HARASSMENT:** Sexual violence and sexual harassment (as defined above) can occur between two children of any age and sex, from primary through to secondary stage and into colleges. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. It is more likely that girls will be the victims of sexual violence and harassment, and it is more likely that it will be perpetrated by boys. It can however occur between children of any sex. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable. Children who are victims of sexual violence and/or sexual harassment wherever it happens, 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 perpetrator(s) attends the same nursery or college.

**HARMFUL SEXUAL BEHAVIOUR:** problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is “harmful sexual behaviour”. Harmful sexual behaviour can occur online and/or face-to-face and can also occur simultaneously between the two. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years’ age difference, or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature.

The Lucy Faithfull Foundation in collaboration with the Home Office, has developed ‘Shore Space’, an online resource which works to prevent harmful sexual behaviour. Shore Space offers a confidential chat service supporting young people who are concerned about their own or someone else’s sexual thoughts and behaviour.



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The Lucy Faithfull Foundation has developed a harmful sexual behaviour toolkit, which amongst other things, provides support, advice and information on how to prevent it, links to organisations and helplines, resources about harmful sexual behaviour by children, internet safety, sexual development and preventing child sexual abuse.

The NSPCC provides free and independent advice about harmful sexual behaviour: NSPCC Learning: Protecting children from harmful sexual behaviour and NSPCC - Harmful sexual behaviour framework.

Beyond Referrals | The Contextual Safeguarding programme based at the University of Durham provides a nursery self-assessment toolkit and guidance for addressing harmful sexual behaviour in schools.

StopItNow – Preventing harmful sexual behaviour in children: provides a guide for parents, carers and professionals to help everyone do their part in keeping children safe, they also run a free confidential helpline.

**SHARING OF NUDES AND/OR SEMI NUDES:** the sending or posting of nude or semi-nude images, videos, or live streams online by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline. The sharing of nudes and semi-nudes can happen publicly online, in 1:1 messaging or via group chats and closed social media accounts and may include images or footage of more than one child or young person.

Alternative terms used by children and young people may include 'dick pics' or 'pics' or may be referred to by adults or professionals as 'youth produced/involved sexual imagery', 'indecent imagery', 'image based sexual abuse' or 'sexting'. Terms such as 'deep fakes' and 'deep nudes' may also be used by adults and young people to refer to digitally manipulated and AI-generated nudes and semi-nudes.

The motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexually or criminally motivated. Such images may be created and shared consensually by young people who are in relationships, as well as between those who are not in a relationship. It is also possible for a young person in a consensual relationship to be coerced into sharing an image with their partner. Incidents may also occur where:

- children and young people find nudes and semi-nudes online and share them claiming to be from a peer
- children and young people digitally manipulate an image of a young person into an existing nude online or use artificial intelligence (AI) to generate a new nude or semi-nude image of a young person
- images created or shared are used to abuse or blackmail peers. Situations could include:
  - children and young people selling nudes or semi-nudes of others online.
  - children and young people coercing a peer into sharing a nude or semi-nude to blackmail them for money, further images, or force them into illegal activity.
  - children and young people hacking a peer's account to share images more widely without consent to publicly shame.
- children and young people create and share a nude or semi-nude with an adult who has presented themselves as someone under the age of 18 to groom, sexually abuse or blackmail them.



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For this reason, incidents can either be classified as 'aggravated' or 'experimental'. The DDCMS / UKIS guidance "*Sharing nudes and semi-nudes: advice for education settings working with children and young people*" (March 2024) sets out the classification of incidents, and how each should be handled.

**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 care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

### **GENERAL SIGNS OF ABUSE:**

Abused children may be afraid to tell anybody about the abuse. They may struggle with feelings of guilt, shame or confusion, particularly if the abuser is a parent, caregiver or other close family member or friend. Anyone working with children needs to be vigilant to the signs listed below.

**Whilst these signs do not necessarily mean that a child is being abused, they probably indicate that the child or family is having some problems that should be investigated.**

- Regularly experiencing nightmares or sleeping problems.
- Changes in personality.
- Outbursts of anger.
- Changes in eating habits.
- Showing an inexplicable fear of particular places or making excuses to avoid particular people.
- Self-harming (includes Head banging, scratching, cutting).
- Not receiving adequate medical attention after injuries.
- Showing violence to animals, toys, peers or adults.
- Knowledge of 'adult issues' e.g. alcohol, drugs, sexual behaviour.
- Lacking in confidence or often wary/anxious.
- Regressing to the behaviour of younger children.
- Regular flinching in response to sudden but harmless actions, e.g. someone raising a hand quickly.

Whether or not a child's behaviour or appearance is concerning depends on their age or stage of development.

**All staff should be aware that children with learning difficulties and/or special educational needs and/or physical disabilities may be particularly vulnerable to abuse, neglect and exploitation.**

The nursery will refer to MKTP's guidance on 'Levels of Need' and also refer to guidance and practical support found in KCSIE (September 2025), including advice on Children who are absent from Education, Child Sexual Exploitation (CSE), Child Criminal Exploitation (CCE), Female Genital Mutilation (FGM) and Preventing Radicalisation.



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### **APPENDIX 3 WHERE TO GET INFORMATION AND SUPPORT FOR MENTAL HEALTH AND WELLBEING**

For support on specific mental health needs:

Anxiety UK [www.anxietyuk.org.uk](http://www.anxietyuk.org.uk)

OCD UK [www.ocduk.org](http://www.ocduk.org)

Depression Alliance [www.depressoinalliance.org](http://www.depressoinalliance.org)

Eating Disorders [www.b-eat.co.uk](http://www.b-eat.co.uk) and [www.inourhands.com](http://www.inourhands.com)

National Self-Harm Network [www.nshn.co.uk](http://www.nshn.co.uk) [www.selfharm.co.uk](http://www.selfharm.co.uk)

Suicidal thoughts Prevention of young suicide UK – PAPHYRUS: [www.papyrus-uk.org](http://www.papyrus-uk.org)

For general information and support

[www.youngminds.org.uk](http://www.youngminds.org.uk) champions young people's mental health and wellbeing [www.mind.org.uk](http://www.mind.org.uk)  
advice and support on mental health problems

[www.minded.org.uk](http://www.minded.org.uk) (e-learning)

[www.time-to-change.org.uk](http://www.time-to-change.org.uk) tackles the stigma of mental health

[www.rethink.org](http://www.rethink.org) challenges attitudes towards mental health



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## APPENDIX 4 DSL JOB DESCRIPTION

<b>Job Title</b>	Designated Safeguarding Lead
<b>Location</b>	Walton Nursery, the Old Rectory, Walton Drive, Milton Keynes, MK7 6BB

<b>Role Summary</b>	<p>The nursery’s Designated Safeguarding Lead (DSL) is the first point of contact for any member of the nursery staff who has a concern about the safety and well-being of a child.</p> <p>The Designated Safeguarding Lead (DSL), has the status and authority within our nursery leadership structure to carry out the duties of the post including committing resources and, where appropriate, supporting and directing other staff.</p> <p>The DSL will provide support to staff members to carry out their safeguarding</p>
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<b>Role of the DSL</b>	<p>KCSIE: (September 2025): Annex C (Role of the Designated Safeguarding Lead) summarises the main areas of responsibility of the safeguarding lead. These include duties of managing referrals, raising awareness, information sharing, providing support to staff and training, as explained below. The Head of EYFS ensures that the DSL has the appropriate status, authority, time, funding, training, supervision, resources and support to fulfil their child welfare and safeguarding responsibilities effectively and to provide direction and advice to staff on child protection matters.</p> <p>The Designated Safeguarding Lead should take lead responsibility for safeguarding and child protection (including online and offline safety). This should be explicit in the post holder’s job description. This person should have the appropriate status and authority within the Nursery to carry out the duties of the post. They should be given the time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings – and/or to support other staff to do so – and to contribute to the assessment of children.</p> <p>If, at any point, there is a risk of immediate serious harm to a child a referral should be made to children’s social care immediately although we recognise that anybody can make a referral.</p> <p>The DSL should undergo child protection training every two years.</p> <p>Deputy Designated Safeguarding Lead(s) will receive the same training, to the same standard, as the DSL and will be given the time, status and authority to be responsible for such matters to deputise for the Designated Safeguarding Lead where appropriate.</p>
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Whilst the activities of the Designated Safeguarding Lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection, as set out above, remains with the Designated Safeguarding Lead; this lead responsibility should not be delegated.

<b>Key Responsibilities</b>	<p>It is the responsibility of Walton Nursery to ensure that there is a Designated Safeguarding Lead (DSL) who will:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> understand the assessment process for providing early help and intervention, for example, through locally agreed assessment processes;</li> <li><input type="checkbox"/> have a working knowledge of how the MASH conducts child protection case conferences and case review conferences, and be able to attend and contribute to these effectively;</li> <li><input type="checkbox"/> ensure that each member of staff has access to and understands the nursery’s child protection policy and procedures, especially new and part-time staff;</li> <li><input type="checkbox"/> be alert to the specific needs of children in need, those with special educational needs and disabilities (SEND) and young carers;</li> <li><input type="checkbox"/> be able to keep detailed, accurate, secure written records of concerns and referrals;</li> <li><input type="checkbox"/> obtain access to resources and attend any relevant or refresher training courses and</li> <li><input type="checkbox"/> encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the nursery or college may put in place to protect them;</li> <li><input type="checkbox"/> notify parents/guardians/carers of our concerns, and provide them with opportunities to change the situation, where this does not place the child at greater risk having sought advice from the local authority;</li> <li><input type="checkbox"/> act as a source of support, advice and expertise for all staff and volunteers and families within the nursery;</li> <li><input type="checkbox"/> ensure all staff have a minimum of level one child protection and where appropriate, level two;</li> <li><input type="checkbox"/> attend refresher training every two years including inter-agency training and provide refresher training every three years so that staff can fulfil their child protection responsibilities effectively and to comply with the requirements set out in ‘Safeguarding Children and Safer Recruitment in Education’ guidance along with any subsequent directives and guidance);</li> <li><input type="checkbox"/> ensure that all staff and volunteers be given a statement (either written or electronically) on the nursery’s policy and procedures and that they understand their responsibilities in being alert to the signs of abuse and responsibility for referring any concerns first verbally, and then in writing, to the designated safeguarding lead responsible for child safeguarding;</li> <li><input type="checkbox"/> ensure that referrals, where appropriate, are made to the Local Authority Designated Officer (LADO) within 24 hours of receiving an allegation;</li> <li><input type="checkbox"/> ensure that copies of child protection records and/or records of concern are transferred accordingly (separate from child files) when a child leaves the nursery and that a written receipt is obtained;</li> </ul>
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- ensure that, where a child on a child protection plan, or is a child looked after, leaves the nursery, their information is transferred to the new nursery immediately and that the child's Social Worker is informed;
- ensure that, where there are deficiencies or weaknesses recognised in arrangements or procedures, these are remedied immediately and without delay.

<b>Managing Referrals</b>	<p>It is the responsibility of the DSL or the alternate, in their absence, to refer all cases of suspected abuse to the local authority children's social care as required and:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Support staff who make referrals to the local authority children's social care</li> <li><input type="checkbox"/> Refer cases to the Channel programme where there is a radicalisation concern as required</li> <li><input type="checkbox"/> Support staff who make referrals to the Channel programme.</li> <li><input type="checkbox"/> Refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required</li> <li><input type="checkbox"/> Refer cases where a crime may have been committed to the Police as required.</li> </ul>
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<b>Work with Others</b>	<p>It is the responsibility of the DSL to</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Liaise with the Head of EYFS/Principal to inform them of issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirement for children to have an Appropriate Adult.</li> <li><input type="checkbox"/> As required, liaise with the 'case manager' and the designated officer(s) at the local authority for child protection concerns in cases which concern a staff member.</li> <li><input type="checkbox"/> Liaise with staff (especially pastoral support staff, nursery nurses, IT Technicians and SENDCOs) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral with relevant agencies.</li> <li><input type="checkbox"/> Liaise with the mental health support team where safeguarding concerns are linked to mental health</li> <li><input type="checkbox"/> Promote supportive engagement with Parents and Carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances</li> <li><input type="checkbox"/> Know those children with a social worker and maintain a culture of high aspirations for this cohort and;</li> <li><input type="checkbox"/> Act as a source of support, advice and expertise for staff.</li> </ul>
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<b>Information Sharing and Managing Child Protection Files</b>	<p>The DSL is responsible for ensuring that child protection files are kept up to date.</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Information should be kept confidential and kept securely.</li> <li><input type="checkbox"/> It is good practice to keep concerns and referrals in a separate child protection file for each child.</li> <li><input type="checkbox"/> Records should include a clear and comprehensive summary of the concern, details of how it was followed up and resolved, a note of any action taken, decisions reached and the outcome.</li> <li><input type="checkbox"/> Where children leave the Nursery (including in-year transfers) the DSL should ensure their child protection file is transferred to the new nursery or school as soon as possible and within 5 days for an in year transfer or within the first 5 days of the start of a new term.</li> <li><input type="checkbox"/> This should be transferred separately from the main child file, ensuring secure transit and confirmation of receipt should be obtained.</li> <li><input type="checkbox"/> In addition to the child protection file, the DSL should also consider if it would be appropriate to share any additional information with the new nursery in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive.</li> </ul>
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<b>Training</b>	<p>The Designated Safeguarding Lead (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years.</p> <p>The Designated Safeguarding Lead should undertake Prevent awareness training.</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, but at least annually, to allow them to understand and keep up with any developments relevant to their role so they:</li> <li><input type="checkbox"/> Understand the assessment process for providing early help and intervention, including local criteria for action and local referral arrangements</li> <li><input type="checkbox"/> Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so</li> <li><input type="checkbox"/> Understand the importance of the role the DSL has in providing information and support to children social care in order to safeguard and promote the welfare of children ▪ Understand the lasting impact that trauma and adversity can have, including on children’s behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes</li> <li><input type="checkbox"/> Are alert to the specific needs of children in need, those with special educational needs and young carers</li> <li><input type="checkbox"/> Understand the importance of information sharing, both within the Nursery and with the safeguarding partners, other agencies, organisations and practitioners</li> <li>Understand and support the Nursery with regard to the requirements of the</li> </ul>
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	<p>Prevent duty and are able to provide advice on and support to staff in protecting children from the risk of radicalization</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Understand the unique risks associated with online and offline safety and are confident they have the relevant up to date knowledge to keep children safe</li> <li><input type="checkbox"/> Can recognise the additional risks that children with SEN face online, for example from online bullying, grooming and radicalization</li> <li><input type="checkbox"/> Obtain access to resources and attend any relevant or refresher training courses and;</li> <li><input type="checkbox"/> Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the Nursery may put in place to protect them.</li> </ul>
<p><b>Providing Support to Staff</b></p>	<p>Training should support the DSL in developing expertise, so they can support and advise staff and help them to feel confident on welfare, safeguarding and child protection matters. This includes specifically to:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> ensure that staff are supported during the referrals processes and;</li> <li><input type="checkbox"/> support staff to consider how safeguarding welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.</li> </ul>
<p><b>Understanding the views of the Children</b></p>	<p>It is important that all children feel heard and understood. Therefore, DSLs (and deputies) should be supported in developing knowledge and skills to:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> encourage a culture of listening to children and taking account of their wishes and feeling, among all staff, and in any measures the Nursery may put in place to protect them, and;</li> <li><input type="checkbox"/> understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.</li> </ul>
<p><b>Raising Awareness</b></p>	<p>The Designated Safeguarding Lead should:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Ensure the Nursery's child protection policies are known, understood and used appropriately by staff</li> <li><input type="checkbox"/> Ensure the Nursery's Safeguarding Policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or Proprietorial Body regarding this</li> <li><input type="checkbox"/> Ensure the Nursery's Safeguarding Policy is available publicly and Parents are aware of the fact that referrals about suspected <b>abuse, neglect and exploitation</b> may be made and the role of the Nursery in this</li> <li><input type="checkbox"/> Link with the local Safeguarding Partnerships to make sure staff are aware of training opportunities and the latest local policies on safeguarding</li> <li><input type="checkbox"/> Promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with nursery and Nursery leadership staff.</li> </ul>



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<b>Holding and Sharing Information</b>	<p>The Designated Safeguarding Lead should be equipped to:</p> <ul style="list-style-type: none"><li><input type="checkbox"/> Understand the importance of information sharing, both within the Nursery, and with other nurseries and schools on transfer including in-year and between primary and secondary education, and with the safeguarding partners, other agencies, organisations and practitioners</li><li><input type="checkbox"/> Understand relevant data protection legislation and regulations, especially the Data Protection act 2018 and the UK General Data Protection Regulation (GDPR)</li><li><input type="checkbox"/> Be able to keep detailed, accurate, secure written records of concerns and referrals and understand the purpose of this record-keeping.</li></ul>
<b>Availability</b>	<p>During term time the designated safeguarding lead (or a deputy) should always be available (during nursery hours) for staff in the nursery to discuss any safeguarding concerns.</p> <p>Whilst the designated safeguarding lead (or deputies) would be expected to be available in person, under exceptional circumstances, the DSL (or deputies) should be available via phone and other such media when possible.</p>