


## Dingley's Promise Safeguarding Policy

### Policy statement

- Dingley's Promise works with children, parents, and the community to ensure the rights and safety of children, and to give them the very best start in life. As part of this, we have robust policies and procedures for Safeguarding Children and Adults who we work with on a daily basis.
- It is essential that any concern regarding the welfare of a child, the child protection flow chart is followed. In addition, any concerns regarding the behaviour of a colleague that may have harmed or have the intention to harm a child, the staff allegation flow chart is followed.
- We comply with this guidance and the arrangements published by our local authority safeguarding partners; Wokingham Borough Council, Reading Borough Council, West Berkshire Council, Gloucestershire County Council, Southampton City Council, Bournemouth Christchurch & Poole Council and Worcestershire County Council; and work with other agencies in line with their Working Together to Safeguard Children guidelines.

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## Definitions

Safeguarding and promoting the welfare of children is defined as:

- Protecting children from maltreatment
- Preventing impairment of children's and learners' Mental and Physical Health or development; (KCSIE SEP 2021, Para4)
- Ensuring children are growing up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcome.

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

**Abuse** is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm (appendix I).

**Neglect** is a form of abuse and is 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.

**Children** include everyone under the age of 18.

## Dingley's Promise – Safeguarding commitment

Dingley's Promise adheres to the three key commitments of the Early Years Alliance Safeguarding Children Policy:

1. **Culture of Safety**
2. **Responding promptly to all incidents or concerns**
3. **Commitment to promoting awareness of abuse.**

### 1. Culture of safety

- We are committed to building a 'culture of safety' in which children are protected from abuse and harm in all areas of our service delivery. To support this The Dingley's Promise Safeguarding handbook was created to compliment our Safeguarding Policy and should be read in conjunction with this policy. A copy of both the handbook and policy are located on a designated display board within each centre.

### 2. Responding promptly to all incidents or concerns

Dingley's Promise is committed to responding promptly and appropriately to all incidents or concerns of abuse that may occur and to work with statutory agencies in accordance with the procedures that are outlined in 'What to do if you're worried a child is being abused' (HMG, 2015) and the Care Act 2014.

Our response aligns with the NSPCC key principles (known as the 4 'Rs') for referring concerns:

## Recognise

- Recognise concerns that a child is being harmed or might be at risk of harm
- Signs of abuse can be physical, emotional, sexual and neglect (see appendix 2).
- When children are suffering from physical, sexual, or emotional abuse, or experiencing neglect, this may be demonstrated through:
  - significant changes in their behaviour.
  - deterioration in their general well-being.
  - their comments which may give cause for concern, or the things they say (direct or indirect disclosure).
  - changes in their appearance, their behaviour, or their play.
  - Unexplained bruising, marks or signs of abuse or neglect.
- We understand how to identify children who may need “Early Help” and how to access services for them.
- We ensure that all staff understand the additional vulnerabilities that arise from special educational needs and/or disabilities, plus inequalities of race, gender, language, religion, sexual orientation, or culture, and that these receive full consideration in relation to child, young person, or vulnerable adult protection.
- We take account of children’s health and safety and well-being including their mental health. (Ofsted page 6)
- If there is a mental health concern about a child that is also a safeguarding concern, staff will take immediate action in following the procedures and speaking to the DSL or a deputy. (KCSIE Sep 2021, Part I, Para45)
- All staff and volunteers are aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. (KCSIE Sep 2021, Part I, Para41)
- Only trained professionals should attempt to make a diagnosis of a mental health, but we observe children and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. (KCSIE Sep 2021, Part I, Para42)
- For children who have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. A child’s experiences can affect their mental health, behaviour, and education. (KCSIE Sep 2021, Part I, Para43)
- We will refer a child who meets the s17 Children Act 1989 child in need definition to local authority children’s social work services.
- The ‘Hidden Harm’ agenda concerns parents with drug and alcohol problems and consider other factors affecting parental capacity and risk, such as social exclusion, domestic violence, radicalisation, mental or physical illness and parent’s learning disability.
- Being homeless or being at risk of becoming homeless presents a real risk to a child’s welfare. The DSL will have contact details and referral routes into the Local Housing Authority and will raise concerns at the earliest opportunity. In most cases, homelessness is in the context of children who live with their families, and intervention will be on that basis.
- The risk for 16 and 17 year olds who are living independently from their parents or guardians, and we respond to the different level of intervention and support they need, and appropriate referrals

will be made based on the child's circumstances. (Ofsted page 6) (keep children safe 2019 Annex A page 82)

- Children with family members in prison are at risk of poor outcomes including poverty, stigma, isolation, and poor mental health. (Keep children safe 2019 Annex A page 79)
- A previously looked after child potentially remains vulnerable and we work with all involved agencies, when necessary, to safeguard the looked after children and previously looked after children in our care.
- A child's vulnerability has the potential to increase when they are privately fostered or being cared for under a private fostering arrangement and will inform our local authority children's social care team.
- We are prepared to act if we have concerns about the welfare of a child who fails to arrive at a learning through play session when expected. The DSL will take immediate action to contact the child's parent to seek an explanation for the child's absence and be assured that the child is safe and well. If no contact is made with the child's parents and the DSL has reason to believe that the child is at risk of significant harm, the relevant professionals are contacted immediately, and Berkshire West Safeguarding Partnerships' procedures are followed. If the child has current involvement with social care the social worker is notified on the day of the unexplained absence.
- Other factors that affect children's vulnerability that may affect, or may have affected, children and young people using our provision, such as abuse of children who have special educational needs and/or disabilities; fabricated or induced illness; child abuse linked to beliefs in spirit possession; sexual exploitation and trafficking of children, including through internet abuse; criminal exploitation including county lines where children may be trafficked within England (Ofsted page 6); Female Genital Mutilation and Radicalisation or Extremism.
- In relation to radicalisation and extremism, we follow the Prevent Duty guidance for England and Wales published by the Home Office and Berkshire West safeguarding partnership procedures on responding to radicalisation.
- We will provide information to complete the standardised National Referral Form, commit to following the referral pathway and local authority procedures.

## Respond

- If a child is in immediate danger, we make a referral to children's social care and/or the police immediately.
- Respond appropriately to a child who is telling you what is happening to him or her
- Where such indicators are apparent, speak to a DSL and put your concerns in writing for the DSL.
- The DSL will review the concern and decides about next steps. The information is stored on the child's personal files.
- If the DSL decides to monitor the concern, the key person will be asked to monitor child and feedback to the DSL within an agreed timescale.

## Refer

- If the DSL decides to report the concern, a referral will be made to the local authority children's social care team, do not delay in passing on concerns.
- Dingley's Promise will co-operate fully in any subsequent investigation. In some cases, this may mean the police, or another agency identified by Berkshire West safeguarding partnership.

- If a staff member or volunteer is unhappy with the decision made of the DSL in relation to whether to make a safeguarding referral, they must follow escalation procedures by speaking to the Regional Operations & Quality Manager, Chief Operating Officer (COO), or Trustee.
- We will respond to any disclosures sensitively and appropriately and take care not to influence the outcome either through the way we speak to children or by asking inappropriate or leading questions of children.

## Record

- The DSL will liaise with other agencies and follow the relevant local authority Safeguarding Partnerships' procedure and if necessary, report child protection and/or child in need concerns.
- The DSL will keep the case under constant review.
- Timelines of interventions will be monitored and reviewed.

## 3. Commitment to promoting awareness of abuse

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

### Training

- Training opportunities are sought for all staff involved in the setting to ensure that they can recognise the signs and signals of possible physical abuse, emotional abuse, sexual abuse, and neglect and that they are aware of the local authority guidelines for making referrals.
- Training opportunities should also cover extra familial threats such as online risks, radicalisation, and grooming, and how to identify and respond to families who may need early help, and organisational safeguarding procedures.
- We ensure that all staff know the procedures for reporting and recording any concerns they may have about the provision.
- We ensure that all staff receive updates on safeguarding via emails, newsletters, online training and/or discussion at staff meetings at least once a year.
- Each Centre has copies of our Dingley's Promise Safeguarding Handbook which was created to detail specific elements of safeguarding as well as supporting confidence and knowledge.

### Planning

- No child is left alone with staff or volunteers in a one-to-one situation without being within sight and/or hearing of other staff or volunteers.

### Curriculum

- Key elements of keeping children safe are included in our programme to promote the personal, social, and emotional development of all children, so that they may grow to be strong, resilient, and listened to and so that they develop an understanding of why and how to keep safe.

- We have a culture of value and respect for individuals, having positive regard for children's heritage arising from their colour, ethnicity, languages spoken at home, cultural and social background.
- We ensure that this is carried out in a way that is developmentally appropriate for the children.

## Governance – Roles & Responsibilities

Safeguarding responsibilities within the Trustee Board and Central Team

Governance of Safeguarding	<b>Liz Roles</b>	Trustee (safeguarding lead)	Liz.roles@dingley.org.uk
Organisational Designated Safeguarding Lead	<b>Lee Friend</b>	Chief Operating Officer	Lee.friend@dingley.org.uk 07388 943455
Organisational Deputy Safeguarding Lead	<b>Louise White</b>	Senior Operations & Quality Manager	Louise.white@dingley.org.uk 07388943462
Organisational Deputy Safeguarding Lead	<b>Megan Harper</b>	Operations & Quality Manager	Megan.harper@dingley.org.uk 07511868117
Organisational Deputy Safeguarding Lead	<b>Theresa Birch</b>	Operations & Quality Manager	Theresa.birch@dingley.org.uk 07754843420

	Lead	Involving	Frequency	Purpose
Board meeting	Safeguarding Trustee	Board	Bi-monthly	Feedback overview at each Board meeting
Management meeting	COO & ROQM	DSLs	Half termly (every 6 weeks)	Discuss safeguarding with DSLs and Centre DSL. Deliver on actions.
Review SG log	Centre DSLs	COO, ROQM, DSLs	Fortnightly	Review all safeguarding incidents in TEAMS spreadsheet, seek further detail as appropriate
Record safeguarding concerns	DSL	Deputy DSL	Daily as required	Record safeguarding incidents as they occur in TEAMS spreadsheet

## DSL Responsibilities – Designated Safeguarding Lead

- Ensure the safeguarding training is appropriate, relevant, and available.
- Oversees the compliance with Dingley's Promise safeguarding policy, supported by the Regional Operations & Quality Manager, Chief Operating Officer and Safeguarding Trustee.
- Tracks completion of safeguarding training
- Updates safeguarding policy

Undertakes the following training.

- Universal safeguarding training – every 3 years
  - Designated safeguarding lead training – every 2 years
  - Designated safeguarding lead network training – every term
  - Support and advise other Centre DSLs within Dingley's Promise
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- Each of our Centres has a named Designated Safeguarding Lead (DSL), and a Deputy DSL who have responsibility for co-ordinating child, young person, and vulnerable adult protection issues.
  - A member of the Trustee Board and Central Team are identified to lead on Safeguarding management and governance.
  - DSLs and deputies receive training in accordance with that recommended by the Local Safeguarding Children Board.
  - All Trustees and Central team members receive safeguarding training every three years.
  - DSL are trained to understand our safeguarding policies and procedures.
  - Provide staff with regular training (see below), and updates as required.
  - Provide families with information and awareness of the Dingley's Promise Safeguarding Children Policy.
  - Notifies the Disclosure and Barring Service of any person who is dismissed from our employment or resigns in circumstances that would otherwise have led to dismissal for reasons of a child protection concern.
  - Implements the procedures to record the details of visitors to the setting. Including security protocols to ensure control over who comes into the setting so that no unauthorised person has unsupervised access to the children.
  - Understand the local procedures for responding to concerns about radicalisation.
  - Has links with the local authority safeguarding team, other statutory and voluntary organisations with regard to safeguarding arrangements. As necessary, they will commit to work with the relevant agencies to safeguard and promote the welfare of local children, including identifying and responding to their needs. (KCSIE)

DSL needs to ensure that all staff and volunteers:

- Read and understand the Dingley's Promise Safeguarding policy and understand that safeguarding is everybody's responsibility.
- Are alert to potential indicators and signs that may indicate a child, young person or vulnerable adult is suffering from abuse, neglect or harm or is at risk.
- Understand their professional duty to ensure safeguarding and child protection concerns are reported to the relevant local authority social care team.

- Undertake the following training.
  - Attend Safeguarding children universal training (every 3 years)
  - Complete Female Genital Mutilation (FGM) training annually
  - Complete Channel/Prevent Awareness training every two years
  - Child sexual exploitation awareness training annually
  - Complete online Safeguarding training course annually
  - Safer Recruitment training (online via NSPCC) if a recruitment manager

DSL will safeguard children by:

- Ensuring all children have a key person to build a relationship with, and are supported to articulate any worries, concerns, or complaints that they may have, in an age-appropriate way.
- Keeping **at least two** emergency contact numbers for each child where possible.
- Ensuring that when children leave the setting, their Child Protection File is discussed as soon as possible with the DSL at the new setting/school and make sure that the Child Protection File is transferred separately from the main pupil file. This is to be delivered by hand and signed for by the new setting to confirm receipt and signed receipt stored with Dingley's Promise copy of the safeguarding file.
- Retaining a copy of the Child Protection file for the period stipulated in current statutory guidance.
- Where the new setting/school is not known, we alert the Education Welfare Officer at local Borough council so that the child's name can be included on the data base for missing pupils.

## **Commitment by all employees, volunteers, students, and trustees**

- Be confident to ask questions in relation to any safeguarding concerns and know not to just take things at face value but can be respectfully sceptical.
- Read and understand the safeguarding and welfare requirements of Statutory framework for the early years' foundation stage (Section 3, P21 September 2021)
- Understand the principles of early help (as defined in *Working Together to Safeguard Children, 2018*) and can identify those children and families who may need early help and enable them to access it.
- Understand the thresholds of significant harm and understand how to access services for families, including for those families who are below the threshold for significant harm, according to arrangements published by the Berkshire west safeguarding partnership.
- Understand how to escalate their concerns if they feel either the local authority and/or Dingley's Promise has not acted to safeguard and know how to follow local safeguarding procedures to resolve professional disputes between staff and organisations. (Whistleblowing)
- Understand their responsibilities under the General Data Protection Regulation and the Data Protection Act 2018, and understand relevant safeguarding legislation, statutory requirements and local safeguarding partner requirements and ensure that any information they may share about parents and their children with other agencies is shared appropriately and lawfully.
- Personal mobile phones and smart watches are not used where children are present.
- We keep a written record of all complaints and concerns including details of how they were responded to.
- We ensure that robust risk assessments are completed, that they are seen and signed by all relevant staff and that they are regularly reviewed and updated, in line with our health and safety policy.
- All staff including volunteers and students understand that the use of reasonable force and restraint is not tolerated.



- Adequate and appropriate staffing resources are provided to meet the needs of children.
- Support families to receive appropriate early help by sharing information with other agencies in accordance with statutory requirements and legislation.
- Share information lawfully with safeguarding partners and other agencies where there are safeguarding concerns.
- Be transparent about how we lawfully process data.
- Ensure that all staff, volunteers, students, and trustees understand that information for safeguarding purposes, including information, which is sensitive and personal, should be treated as 'special category personal data.' (KCSIE)
- Understand that 'safeguarding of children and individuals at risk' is a processing condition that allows practitioners to share special category personal data. Information can be shared without consent where there is a good reason to do so. This include if to gain consent would place a child at risk or that the sharing of information will enhance the safeguarding of a child in a timely manner, but it is not possible to gain consent. (KCSIE )
- All staff, volunteers, students, and trustees understand what the organisation expects of them in terms of their required behaviour and conduct and follow our policies and procedures.
- All staff including volunteers and students understand our policy on promoting positive behaviour and follow it in relation to children showing aggression towards other children.
- Children are not photographed or filmed on video for any other purpose than to record their development or their participation in events organised by us. Parents sign a consent form and have access to records holding visual images of their child. Staff do not use personal cameras or filming equipment to record images.
- Where the setting chooses to allow the recording of images by parents, at events, it will be made clear that images may only be recorded for personal use and images must not be shared on social networking sites or other websites that are accessible by the public.

## Safer Recruitment

- When recruiting, at least one person on any appointment panel has had safer recruitment training. (Ofsted page 24 related to maintained school)
- Applicants for posts within the setting are clearly informed that the positions are exempt from the Rehabilitation of Offenders Act 1974.
- Enhanced DBS (Disclosure and Barring Service) checks and other suitability checks are carried out for staff and volunteers prior to their post being confirmed, to ensure that no disqualified person or unsuitable person works at the setting or has access to the children.
- All employees and volunteers must hold a DSB check on the update service to allow for periodic checks on their DBS status with permission from the individual
- Where applications are rejected based on information disclosed, applicants have the right to know and to challenge incorrect information.
- We seek additional criminal records checks for Individuals who have lived or worked outside the UK and make any further checks we think appropriate so that any relevant events that occurred outside the UK can be considered. We follow the Home Office guidance on criminal records checks for overseas applicants. (Keeping Children Safe) + (Ofsted page 28 paragraph2)

- We always ask for written information about previous employment history and check that information is not contradictory or incomplete. References should always be obtained from the candidate's current employer. Where a candidate is not currently employed, we obtain the verification of their most recent period of employment and reasons for leaving. (Keeping Children Safe) We question any gaps in employment and record what the individual was doing during these periods of unemployment.
- Information is recorded about staff qualifications, and the identity checks and vetting processes that have been completed including:
  - the DBS reference number.
  - certificate of good conduct or equivalent where a UK DBS check is not appropriate.
  - the date the disclosure was obtained; and
  - details of who obtained it.
- Volunteers must:
  - be aged 17 or over.
  - be considered competent and responsible.
  - receive a robust induction and regular supervisory meetings.
  - be familiar with all the settings policies and procedures.
  - be fully checked for suitability if they are to have unsupervised access to the children at any time.
- All staff, volunteers and students are informed that they are expected to disclose any convictions, cautions, court orders or reprimands and warnings which may affect their suitability to work with children (whether received before or during their employment with us).
- All volunteers and students must have a DBS on the update service
- From 31 August 2018, staff, volunteers, and students in childcare settings that are not based on domestic premises are **not** required to notify their line manager if anyone in their household (including family members, lodgers, partners etc.) has any relevant convictions, cautions, court orders, reprimands or warnings or has been barred from, or had registration refused or cancelled in relation to any childcare provision or have had orders made in relation to care of their children.
- Dingley's Promise staff working with children may have an issue that arises in their personal life which may be relevant to their role at work. This includes:
  - Their child has been the subject of child protection enquiries by children's social care (often referred to as S47 enquiries or investigations)
  - Their child has a child protection plan
  - They have been arrested, cautioned, or convicted in relation to offences of violence
  - They have difficulties with drug or alcohol misuse or other issues such as mental health, which might impact on their ability to do their job safely
- We encourage staff and volunteers to inform the DSL about any significant safeguarding events in their personal life as early as possible.
- Where we are informed about any personal life issues that are relevant to the work at Dingley, the DSL will contact local authority designated office (LADO) and Ofsted if it is advised by LADO.
- Line Managers need to ensure that all staff, volunteers, and students:
  - receive regular supervision, which includes discussion of any safeguarding issues, and their performance and learning needs. These are reviewed regularly.

- are provided with clear expectations in relation to their behaviour [outlined in the Staff Handbook].
- The DSLs will undertake their role adequately and offer advice, guidance, supervision, and support.
- The DSL will inform the Charity DSL at the first opportunity of every significant safeguarding concern; however, this should not delay any referrals being made to children's social care, or where appropriate, the LADO, Ofsted or RIDDOR.

## *Children and Young people not in our care*

- While abuse and safeguarding issues may be less likely to affect young children in our care, we respond promptly and appropriately if any of these factors affecting older children and young people who we may come into contact with for example siblings, students, or school children on work placement.
- If we become concerned that a child may be a victim of modern slavery or human trafficking, we will refer to the National Referral Mechanism, as soon as possible and refer and/or seek advice to the local authority children's social work service and/or police.
- We take account of the need to protect young people aged 16-19 as defined by the Children Act 1989. This may include students or school children on work placement, young employees, or young parents.
- Where abuse or neglect is suspected we follow the procedure for reporting any other child protection concerns. The views of the young person will always be considered in an age-appropriate way, but the setting may override the young person's refusal to consent to share information if it feels that it is necessary to prevent a crime from being committed or intervene where one may have been, or to prevent harm to a child or adult. Sharing confidential information without consent is done only where not sharing it could be worse than the outcome of having shared it.

## *Safeguarding Adults*

Adults can also be vulnerable, and we know how to refer adults who need community care services. We also recognise that safeguarding decisions should take account of the ability to give informed consent and comply with the Mental Capacity Act 2005. Please note the Mental capacity Act 2005 also covers 16- 18 year olds as well as adults.

## *Informed Consent*

Consent should be informed. This means that the person giving consent should understand what's involved and what the implications of sharing information are. Getting explicit consent is best practice and such consent should be obtained at the start of any discussions. Consent should also be documented and its important to remember that if consent is revoked, this must be respected.

## *Mobile phones, electronic device & social media*

This policy refers to all electronic devices that are able to take pictures, record videos, and can send or receive calls and messages. This includes cameras, mobile phones, tablets, and any recording devices including smartwatches.

At our Centres we promote the safety and welfare of all the children in our care. To ensure the safety and wellbeing of our children we do not allow team members to use personal mobile phones during work hours, unless they are in a scheduled break and not in close proximity of the children.

Personal mobile phones or any other electronic devices with imaging or sharing abilities are not permitted to be used at the Employer's premises during working hours. If you bring a personal mobile phone to work, it is a requirement that all personal mobile phones are switched off and placed in the safe space provided.

Please note that each Centre may have a different designated location for the storing of personal mobile phones, please check with each individual Centre Manager.

Calls to and from personal mobile phones (including text messages) should only take place during breaks and you should be away from your workplace. In exceptional circumstances if you need to make a call or receive an important call during your working hours, you must ask permission of the Manager and agree on the specific arrangements for use of the mobile phone for that day.

Mobile phones that can take and send photographs or videos may not be used in this way whilst on duty unless authorised by your line manager and with the prior consent of the subject(s) to be photographed or videoed.

Where trips are taken outside of the setting (either outings or home visits) and mobile phones are not provided by the setting, employees may use a personal mobile, which is fully charged and switched on for the duration of the trip. This number is recorded in the outings book.

Charity landlines are solely for calls in relation to the operations of the Charity and must not be used for personal use.

## Whistleblowing

Whistleblowing is the reporting of suspected malpractice, wrongdoing, or dangers in relation to the activities the Company undertakes. The kinds of malpractice covered by this policy include:

- The inappropriate treatment or care of a child
- Any breach in the behaviour of manager, staff, student or volunteer
- Discrimination of any kind
- Abuse of position
- Concerns that could impact on the health and safety of the children or adults.
- Damage to the environment.
- Tampering with documents
- Inappropriate use of settings assets
- Decision making for personal gain.
- Criminal offences, including those in relation to bribery and corruption and tax evasion facilitation.
- Breach of any legal obligation, including those in relation to bribery and corruption and tax evasion facilitation.
- Inappropriate use of budget
- Miscarriages of justice.
- Deliberately concealing any of the above.

## How to raise your concern:

### **Stage 1: Internal Line Management**

If you have a concern about malpractice, we hope you will feel able to raise it first with your line manager or a more senior manager. This should be done in writing. It will help if you state the facts of the matter clearly. You can outline how you would like it to be investigated. If you have a direct or personal interest in the matter, you should also tell us at this stage.

### **Stage 2: Alternative contacts**

If you feel unable to raise the matter with someone in your line management, for whatever reason, please speak to the COO, Regional Operations & Quality Manager or in their absence the CEO.

If you want to raise the matter in confidence, we will ensure that practical measures are put in place to protect your identity. We will contact you by the most secure means. We will not disclose your identity without your agreement unless we are required to do so by law.

Once you have reported your concern, we will investigate it to assess what action should be taken initially. If your concern falls more appropriately within other policies, we will tell you. A manager will be asked to carry out the investigation.

The disclosure will be treated seriously and will be promptly investigated. As part of the process the worker will be interviewed and asked to provide a written statement.

If it is a Safeguarding concern, Safeguarding procedures will be followed including those already mentioned that relate to allegations against staff and may form the subject of an independent inquiry.

Once we have finalised the investigation, any necessary action will be taken.

While the purpose of this policy is to enable us to investigate possible malpractice and take appropriate steps to deal with it, we will give you as much feedback as we properly can. If requested, we will confirm our response to you in writing. Please note, however, that we may not be able to tell you the precise action we take where this would infringe a duty of confidentiality owed by us to someone else.

### **If You are Dissatisfied**

If you are unhappy with our response, you may then go to the proper authority. However, we do ask that matters are reported to us in the first instance. While we cannot guarantee that we will respond to all matters in the way that you might wish, the matter will be handled fairly and properly. By using this policy, you will help us to achieve this.

### **Raising your concern externally – exceptional cases**

The main purpose of this policy is to give all our staff the opportunity and protection they need to raise concerns internally. We would expect that in almost all cases raising concerns internally would be the most appropriate course of action.

However, if for whatever reason, you feel you cannot raise your concerns internally and you reasonably believe the information and any allegations are substantially true, the law recognises that it may be appropriate for you to raise the matter with another prescribed person, such as a regulator or professional body or an MP. A list of the relevant prescribed people and bodies for this purpose and the areas for which they are responsible is available on the GOV.UK website.

If you are not satisfied with the outcome of the investigation, you may elevate your concerns directly to Ofsted  
Tel: 0300 123 3155 or Email: [whistleblowing@ofsted.gov.uk](mailto:whistleblowing@ofsted.gov.uk).

## **Protection and support for those raising concerns**

If you raise a genuine concern, you will not be at risk of damaging your position as a result. Provided you are acting in the public interest it does not matter whether or not your concern proves to be well founded. Any individual raising a genuine concern must not suffer any detriment as a result of doing so. You must however make your complaint to the right person and in the right way as detailed in this Policy. We do not extend this assurance to someone who acts from an improper motive and raises a matter they know to be untrue.

No member of staff must threaten or retaliate against an individual who has raised a concern and we will not tolerate any such harassment or victimisation. Any person involved in such conduct may be subject to disciplinary action and in some cases will be liable to a claim for compensation brought against them personally.

However, to ensure the protection of all our staff, those who raise a concern frivolously, maliciously and/or for personal gain and/or make an allegation they do not reasonably believe to be true and/or made in the public interest will also be liable to disciplinary action.

We expect all of our colleagues, both internal and external, to always be professional and hold the welfare and safety of every child and the best interests of the Charity as their paramount objective. We recognise that there may be occasions where this may not happen and we have in place a procedure for team members to disclose information that suggests children's welfare, or the Charity, may be at risk.

We expect all colleagues to talk through any concerns that they may have with their line Manager or Centre Management at the earliest opportunity to enable any problems to be resolved as soon as they arise.

The Public interest disclosure act 1998 – commonly known as the 'Whistleblowing Act', provides protection for employees to raise legitimate concerns about specified matters. A disclosure may be made by an employee or colleague who has reasonable belief that one of the following is being, has been or is likely to occur:

- A criminal offence
- A miscarriage of justice
- An act creating risk to health & safety
- An act causing damage to the environment
- A breach of any other legal obligation (eg EYFS/National Health & Care Standards/Equalities Act 2010)
- Unethical conduct
- An act that may be deemed as radicalised or a threat to national security
- Concealment of any of the above

It is not necessary for the employee to have proof that such an act is being, has been, or is likely to be committed, reasonable belief is sufficient.

## **Disclosure procedure**

- If information relates to safeguarding, then the Charity Safeguarding policy should be followed
- When you reasonably believe that one of the above has occurred or is likely to occur, you should promptly disclose this to your line Manger so that appropriate action can be taken.
- If it is inappropriate or you are unable to make a disclosure to your line manager, you must speak to another Charity representative such as the COO or Regional Operations & Quality Manager

- Employees will suffer no detriment of any sort for making such a disclosure in accordance with this procedure
- Any employee who is involved in victimising employees who make a disclosure, takes any action to deter employees from disclosing information or makes malicious allegations in bad faith will be subject to potential disciplinary action
- Failure to report serious matters can also be investigated and potentially lead to disciplinary action
- Any management employee who inappropriately deals with a whistleblowing issue, including a safeguarding report or referral, may be deemed to have engaged in gross misconduct which could lead to dismissal
- All colleagues are made aware of where the contact numbers are for the local authority designated officer (LADO), children's social care team and Ofsted should they wish to make a disclosure as part of this policy
- If anybody feels that the disclosure has not been handled, dealt with or taken seriously, they must take the concern to a more senior colleague of the Charity in the first instance. If they still feel it has not been responded to or dealt with, they can contact LADO/Ofsted/Local authority/Children's social care team.
- All staff know that they can contact the NSPCC whistleblowing helpline if they feel that the organisation and the local authority have not taken appropriate action to safeguard a child, and this has not been addressed satisfactorily through organisational escalation and professional challenge procedures.

## Recording concerns

Where a child makes comments to a member of staff that give cause for concern (disclosure), or a member of staff observes signs or signals that give cause for concern, such as significant changes in behaviour; deterioration in general well-being; unexplained bruising, marks or signs of abuse or neglect, that member of staff:

- listens to the child, offers reassurance, and gives assurance that she or he will act.
- does not question the child.
- makes a written record that forms an objective record of the observation or disclosure that includes: the date and time of the observation or the disclosure; the exact words spoken by the child as far as possible; the name of the person to whom the concern was reported, with the date and time; and the names of any other person present at the time.

These records are signed and dated and kept in a Safeguarding file, which is kept securely and confidentially. Entries in this file are recorded in diary form in the child's own file. A chronology of significant events is started and also kept on file - this records and events in a child's life that may cause concern or a change in behaviour. The DSL is informed of the issue at the earliest opportunity and always within one working day.

Employees should make an objective record of any observations or disclosure, supported by the DSL or Centre Management Team. The record should include:

- Child's name
- Date of birth
- Child's address
- Date and time of the observation or disclosure
- Exact words spoken by child
- Exact position, type of injury or mark and a clear description of any injury visible
- Any discussion held with the parents

It is essential that the person who witnessed or who has raised the concern records this information immediately to ensure it is the child's voice that is recorded as accurately as possible.

## Reporting & Referrals

All employees have a responsibility to report safeguarding concerns and suspicions of abuse. These concerns will be discussed with the DSL or Centre Management. If anyone feels unable to report concerns to the DSL or Centre Management, they should call the local authority children's social care team or the NSPCC to report their concerns. To support Staff knowledge and understanding of the processes to follow, each centre has a designated Safeguarding display board which details contact information for both organisation and Local Authority contacts within Children's Services & Safeguarding. , named Safeguarding Leads as well as flowcharts for making referrals.

Where a child has been harmed, is at risk of harm, or is in immediate danger, we make a referral to local children's social care.

- The Centre Management, Centre DSL and Charity DSL all attend training on local procedures of how to make a referral and who to contact to discuss a concern.
- If it is believed that a child is in immediate danger, we will contact the Police.
- If the safeguarding concern relates to an allegation against an adult working or volunteering with children, then the DSL will follow the reporting allegations procedure.
- Contact details for the local authority/children's social care team on how to make a referral are clearly displayed for all employees, volunteers and students to see.
- We will record the information for the referral, record the person's name who we made the referral to and record and act on any actions arising from the referral.
- Following a referral, we will speak to the child's parents – unless advised not to do so by the LA children's social care team.
- The local authority should decide within 1 working day of a referral about what course of action to take and should acknowledge the receipt and let the person who made the referral know the outcome. The DSL who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.
- Each local authority provides forms and guidance on how to complete a referral.

## Escalation Process

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

## Informing Parents

- Parents are normally the first point of contact. Concerns are normally discussed with parents to gain their view of events, unless it is felt that this may put the child or other person at risk or may interfere with the course of a police investigation, or may unduly delay the referral, or unless it is otherwise unreasonable to seek consent. Advice will be sought from social care, or in some circumstances police, where necessary.



- Parents are informed when we make a record of concerns in their child's file and that we also make a note of any discussion we have with them regarding a concern.
- If a suspicion of abuse warrants referral to social care, parents are informed that the referral will be made, except where the procedures of the local children's social care team does not allow this, for example, where it is believed that the child may be placed at risk. This will usually be the case where the parent is the likely abuser or where sexual abuse may have occurred.
- If there is a possibility that advising a parent beforehand may place a child at greater risk (or interfere with a police response) the DSL should consider seeking advice from children's social care, about whether or not to advise parents beforehand, and should record and follow the advice given.

## ***Liaising with other agencies and multi-agency working.***

- We work within the local authority and children's social care team guidelines.
- The current version of 'What to do if you're worried a child is being abused' available for parents and staff and all staff are familiar with what they need to do if they have concerns.
- We have procedures for contacting the local authority regarding child protection issues and concerns about children's welfare.
- We notify Ofsted of any incident or accident and any changes in our arrangements which may affect the well-being of children or where an allegation of abuse is made against a member of staff (whether the allegations relate to harm or abuse committed on our premises or elsewhere). Notifications to Ofsted are made as soon as is reasonably practicable, but at the latest within 14 days of the allegations being made.
- Contact details for the local National Society for the Prevention of Cruelty to Children (NSPCC) are also kept.

## ***Allegations against adults working or volunteering with children.***

- We ensure that all parents and staff know how to complain about the behaviour or actions of staff or volunteers within the setting, or anyone living or working on the premises occupied by the setting, which may include an allegation of abuse.
- We ensure that all staff, volunteers, and anyone else working in the setting knows how to raise concerns that they may have about the conduct or behaviour of other people including staff/colleagues.
- We differentiate between allegations, and concerns about the quality of care or practice and complaints and have a separate process for responding to complaints.
- We respond to any inappropriate behaviour displayed by members of staff, volunteer or any other person living or working on the premises, which includes:
  - inappropriate sexual comments.
  - excessive one-to-one attention beyond the requirements of their usual role and responsibilities, or inappropriate sharing of images
- We will recognise and respond to allegations, that a person who works with children (including supply staff and volunteer (KCSIE, Part4, Para211) has:
  - behaved in a way that has harmed a child, or may have harmed a child
  - possibly committed a criminal offence against or related to a child
  - behaved towards a child or children in a way that indicates they may pose a risk of harm to children

- behaved or may have behaved in a way that indicates they may not be suitable to work with children. (KCSIE). For example, a member of staff is involved in domestic violence at home. No children were involved, but schools/colleges need to consider what triggered these actions and could a child in the setting trigger the same reaction, therefore being put at risk.
- We respond to any concerns raised by staff and volunteers who know how to escalate their concerns if they are not satisfied with our response.
- We respond to any disclosure by children or staff that abuse by a member of staff or volunteer within the setting, or anyone working on the premises occupied by the setting, may have taken, or is taking place, by first recording the details of any such alleged incident.
- We refer any such complaint immediately to a DSL, Senior Member of Staff within the organisation and the Local Authority Designated Officer (LADO) as necessary to investigate and/or offer advice.
- We report any such alleged incident to Ofsted, as well as what measures we have taken. It is an offence not to do this.
- We co-operate entirely with any investigation carried out by children's social care in conjunction with the police.
- Where the management team and children's social care team agree it is appropriate in the circumstances, the member of staff or volunteer will be suspended for the duration of the investigation. This is not an indication of admission that the alleged incident has taken place, but is to protect the staff, as well as children and families, throughout the process. Where it is appropriate and practical and agreed with LADO, we will seek to offer an alternative to suspension for the duration of the investigation, if an alternative is available that will safeguard children and not place the affected staff or volunteer at risk.

### ***Disciplinary action following an allegation against an adult.***

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

### ***Confidentiality***

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

### ***Support to families***

- Building trusting and supportive relationships with families, staff and volunteers is essential.
- Parents are informed of our role and responsibilities in relation to child protection, such as for the reporting of concerns, information sharing, monitoring of the child, and always liaising with the local children's social care team.
- Children and families will continue to be welcomed into our centres whilst investigations are underway in relation to any alleged abuse.
- We follow the Child Protection Plan as set by the child's social care worker in relation to the setting's DSL and tasks in supporting that child and their family, after any investigation.

- We will engage with any child in need plan or early help plan as agreed.
- Confidential records kept on a child are shared with the child's parents or those who have parental responsibility for the child in accordance with the Confidentiality and Client Access to Records procedure and only if appropriate under the guidance of the local authority.

## Safeguarding Contacts

### Local Authority Designated Officer (LADO)

#### Reading

LADO 0118 937 3555, Mobile: 07841 253871, email [LADO@reading.gov.uk](mailto:LADO@reading.gov.uk)

#### Wokingham

Telephone: 0118 974 6141, email: [LADO@wokingham.gov.uk](mailto:LADO@wokingham.gov.uk)

#### West Berkshire (Newbury)

LADO 01635 503153, email [LADO@westberks.gov.uk](mailto:LADO@westberks.gov.uk)

#### Gloucester

LADO 01452 425000, email [amadmin@gloucestershire.gov.uk](mailto:amadmin@gloucestershire.gov.uk)

#### Southampton

LADO 02380 915535, email [LADO@southampton.gov.uk](mailto:LADO@southampton.gov.uk)

#### Bournemouth

LADO 01202 817600, email [LADO@bcpcouncil.gov.uk](mailto:LADO@bcpcouncil.gov.uk)

#### Worcestershire

LADO 01905 846221, email [LADO@worcestershire.gov.uk](mailto:LADO@worcestershire.gov.uk)

## Referrals

**Call 999 in an emergency or if you believe a child is in immediate danger.**

#### Reading

**Phone:** 0118 937 3641

Children's Single Point of Access, available 9am to 5pm, Monday to Friday (excluding bank holidays).

**Email:** [CSPOA@brighterfuturesforchildren.org](mailto:CSPOA@brighterfuturesforchildren.org)

Web form, which can be found at: [www.reading.gov.uk/childrensreferralform](http://www.reading.gov.uk/childrensreferralform)

Emergency Duty Team - out of office hours 01344 786543

#### Wokingham

**Phone:** 0118 908 8002

Referral and Assessment Team (Children's Safeguarding and Social Care Team):

**Email:** [triage@wokingham.gov.uk](mailto:triage@wokingham.gov.uk)

You will also need to complete a multi-agency referral form MARF (Multi Agency Referral Form)

Emergency Duty Team - out of office hours: telephone: **01344 786 543**

#### West Berks (Newbury)

**Phone:** 01635 503090

CASS (Contact, Advice and Assessment Service):

**Email:** [child@westberks.gov.uk](mailto:child@westberks.gov.uk)

Children's Services Out of Hours Emergency Duty Service (EDT): 01344 786543 or email [edt@bracknell-forest.gov.uk](mailto:edt@bracknell-forest.gov.uk)

### **Gloucester & Cheltenham**

**Phone:** 01452 426565

MASH Multi Agency Safeguarding Hub.

Email: [childrenshelpdesk@gloucestershire.gov.uk](mailto:childrenshelpdesk@gloucestershire.gov.uk)

Out of hours: 01452 614194

### **Southampton**

**Phone:** 02380 832300

Children's Resource Services

**Email:** [childrensresourceservice@southampton.gov.uk](mailto:childrensresourceservice@southampton.gov.uk)

Out of hours: 02380 233344

### **Bournemouth**

**Phone:** 01202 123334

Children's First Response Hub

**Email:** [childrensfirstresponse@bcpcouncil.gov.uk](mailto:childrensfirstresponse@bcpcouncil.gov.uk)

Out of hours: 01202 738256

### **Droitwich & Worcester**

**Phone** 01905 822666

Family Front Door.

Out of hours: 01905 768020

### **NSPCC**

*What to do if you are worried about a child* is available as an alternative route to raise concerns regarding child.

The telephone lines are open **Monday to Friday 8am – 10pm** and **9am – 6pm at the weekend**. You can contact NSPCC, online, **24 hours a day, 365 days a year**.

Phone: **0808 800 5000**

Email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

Online report: <https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/report/report-abuse-online/>

## **Legal Framework**

### **Primary legislation**

- Children Act (1989 s47)
- Protection of Children Act (1999)
- The Children Act (2004 s11)
- Children and Social Work Act 2017
- Safeguarding Vulnerable Groups Act (2006)

- Childcare Act (2006)
- Child Safeguarding Practice Review and Relevant Agency (England) Regulations 2018

## **Secondary legislation**

- Sexual Offences Act (2003)
- Criminal Justice and Court Services Act (2000)
- Equality Act (2010)
- General Data Protection Regulations (GDPR) (2018)
- Childcare (Disqualification) Regulations (2009)
- Children and Families Act (2014)
- Care Act (2014)
- Serious Crime Act (2015)
- Counterterrorism and Security Act (2015)

## **Further Guidance**

- Working Together to Safeguard Children (HMG, 2018)
- What to do if you are Worried a Child is Being Abused (HMG, 2015)
- Keeping children safe in education 2023
- Statutory framework for the Early Years Foundation Stage(2023)
- Framework for the Assessment of Children in Need and their Families (DoH 2000)
- The Common Assessment Framework for Children and Young People: A Guide for Practitioners (CWDC 2010)
- Statutory guidance on how to safeguard and promote the welfare of children under section 11 of the Children Act 2004 (HMG 2008)
- \* Harm – Responding to the Needs of Children of Problem Drug Users (ACMD, 2003)
- Information Sharing: Advice for Practitioners providing Safeguarding Services (DfE 2018)
- Disclosure and Barring Service: [www.gov.uk/disclosure-barring-service-check](http://www.gov.uk/disclosure-barring-service-check)
- Revised Prevent Duty Guidance for England and Wales (HMG, 2019)
- The prevent duty: for school and childcare providers (DoE2015)
- Inspecting Safeguarding in Early Years, Education and Skills Settings, (Ofsted, August 2021)
- Safeguarding Children (Pre-school Learning Alliance 2013)
- Safeguarding through Effective Supervision (Pre-school Learning Alliance 2013)
- The New Early Years Employee Handbook (Pre-school Learning Alliance 2016)
- People Management in the Early Years (Pre-school Learning Alliance 2016)



## **Early Help**

Any child may benefit from early help, but staff should be particularly alert to the potential need for early help for a child who:

- is disabled and has specific additional needs.
- has special educational needs (whether they have a statutory Education, Health and Care Plan.).
- is a young carer.
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups.
- is frequently missing/goes missing from care or from home.
- is at risk of modern slavery, trafficking or exploitation; is at risk of being radicalised or exploited.

- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse.
- is misusing drugs or alcohol themselves.
- has returned home to their family from care; and
- is a privately fostered child.

## Policy Review

Policy reviewed on: 25/11/2024	Signed on behalf of the charity.  Board of Trustees	Date for review: 25/11/2025
	 Lee Friend Chief Operating Officer	