

Safeguarding Policy

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1. Introduction

This policy has been developed in accordance with the principles established by the Children Act 1989, and in line with the following:

- “Working Together to Safeguard Children 2023”

- “Framework for the Assessment of Children in Need and their Families 2000”
- “What to do if you are worried a Child is being Abused 2015”¹
- “Keeping Children Safe in Education 2024
- Oxfordshire Safeguarding Children Partnership guidelines

And in line with the following principles:

- The welfare of the child is paramount (Children Act 1989).
- Children have a right to protection from being hurt, violence, abuse and neglect (United Nations Convention on the Rights of the Child, Article 19).
- All staff have a responsibility to take action in cases of alleged or suspected child abuse, neglect or bullying.
- Any adult or child may inflict abuse. This could include a member of staff or volunteer.
- Immediate action is required where there is an allegation or serious suspicion of abuse or serious bullying and a referral must be made to the County Council Assessment Team. A telephone referral must be followed by a written referral using the Assessment and Referral form. Where staff are the subject of the allegation, the Chief Executive Officer of People must be informed.
- Records must be confidentially kept and securely stored.
- All such suspicions and investigations will be kept confidential, shared only with those who need to know.
- We work with parents to build their understanding of, and commitment to, the principles of safeguarding all our children.
- We work to implement EYFS key themes and commitments:
 - A Unique Child – 1.2 Inclusive practice
 - Positive Relationships – 2.1 Respecting each other
 - Enabling Environments – 3.2 Supporting every child
 - Learning & Development – 4.4 Personal, social and emotional development

¹ What To Do If You Are Worried a Child is Being Abused: <https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2>

People's safeguarding policy is consistent with the procedures approved by the Oxfordshire Safeguarding Children Partnership (OSCP) and Oxfordshire County Council Safeguarding Pupils Policy.

2. Overall principles

People is committed to promoting and safeguarding the well-being of children within our community. People aims to establish a safe and nurturing environment where children feel safe and happy when participating in People activities. People is committed to upholding British values (appendix 9).

During their day-to-day contact with families People delivery staff need to be able to recognise and know how to act upon indicators that a child's safety or well-being may be at risk.

We acknowledge that abuse of children can take different forms - physical, emotional, and sexual, as well as neglect.

Children can be vulnerable to abuse by their peers. Such abuse should be taken as seriously as abuse by adults and should be subject to the same child protection procedures.

When children are suffering from physical, sexual or emotional abuse, or experiencing neglect, this may be demonstrated through:

- significant changes in their behaviour;
- deterioration in their general well-being;
- their comments which may give cause for concern, or the things they say (direct or indirect disclosure);
- changes in their appearance, their behaviour, or their play;
- unexplained bruising, marks or signs of possible abuse or neglect; and
- any reason to suspect neglect or abuse outside the setting.

We consider factors affecting parental capacity and risk, such as social exclusion, domestic violence, parent's drug or alcohol abuse, mental or physical illness or parent's learning disability.

Bullying is a safeguarding matter that if left unresolved can become a child protection matter. To allow or condone bullying may lead to consideration under child protection procedures. We will take seriously any bullying concerns and both investigate and take action to protect children where appropriate.

We are aware of other factors that affect children's vulnerability such as, abuse of disabled children; fabricated or induced illness; child abuse linked to beliefs in spirit possession; sexual exploitation of children, such as through internet abuse; and Female Genital Mutilation and radicalisation that may affect, or may have affected, children and young people using our provision. See appendix 10.

We also make ourselves aware that some children and young people are affected by gang activity, by complex, multiple or organised abuse, through forced marriage or honour-based violence or may be victims of child trafficking. While this may be less likely to affect young children in our care, we may become aware of any of these factors affecting older children and young people who we may come into contact with. Practitioners understand the mandatory duty to report to police any case where an

act of female genital mutilation appears to have been carried out on a girl under the age of 18. See appendix 10.

We also 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 is suspected we follow the procedure for reporting any other child protection concerns. The views of the young person will always be taken into account, 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.

Should any concerns arise on the part of People staff relating to the well-being of a child these will be reported using the channels of communication described below. People has a named Designated Officers and four Designated Safeguarding Leads (see Appendix 1) who deal with safeguarding matters on a day-to-day basis.

Outside agencies will be consulted as appropriate. We recognise that support for children cannot be achieved by a single agency acting alone. Protecting children from harm depends on relevant agencies working well together.

People staff will be properly supported to deal with these difficult issues. Staff should not act alone and should not take issues home. All staff and volunteers who have regular contact with our children are subject to regular enhanced DBS checks or an enhanced check through Disclosure Scotland as appropriate.

3. Staff recruitment and training

Training:

- The safeguarding knowledge and skills of the Designated Safeguarding Officers and Leads are refreshed at least annually.
- There is an appropriately trained Designated Lead member of staff available at all times for staff to discuss concerns.
- The Safeguarding Policy and Procedure is covered in the induction process for all staff and all staff involved in child care and programme delivery attend training which is updated every 2 years in order to develop their understanding of the signs and indicators of abuse, how to respond to a child who discloses abuse and the procedure to be followed in appropriately sharing a concern of possible abuse or a disclosure of abuse.
- All staff involved in childcare and programme delivery receive information on safeguarding and child protection at least annually.
- All staff have adequate information on issues affecting vulnerability in families such as social exclusion, domestic violence, mental illness, substance misuse and parental learning disability, together with training that takes account of factors that affect children that arise from inequalities of race, gender, disability, language, religion, sexual orientation, or culture.

- All staff involved in childcare and programme delivery undertake training in the Prevent Duty aimed at ensuring due regard is given to the need to prevent people from being drawn into terrorism.
- All staff involved in childcare and programme delivery undertake training in FGM (female genital mutilation) where advice is provided on preventative measures.

Recruitment:

- Full details of Peeple recruitment procedures can be found in the Peeple Recruitment and Selection Policy.
- Managers involved in recruitment of childcare and delivery staff will undertake safer recruitment training at least once every 5 years and each interview panel will have at least one member who has been trained in safer recruitment procedures.
- All staff and volunteers will have an enhanced check by the Disclosure and Barring Service. This will be before starting work if possible. If this is not possible a full risk assessment must be done as soon as possible, and the person must be supervised at all times.
- All staff are asked to join the Disclosure and Barring update service, where enhanced checks are carried out annually. Staff who opt out of this service, must renew their enhanced check by the Disclosure and Barring Service every three years.
- All applicants for work, whether voluntary or paid, will be interviewed before an appointment is made and will be asked to provide the names of two referees, at least one of which should be external to Peeple. All such references will be followed up.
- All appointments, both paid and voluntary, will be subject to a probationary period (unless the person is moving from another job within Peeple).
- We ensure all staff receive appropriate training on safeguarding at induction and that our induction training relating to Safeguarding is updated regularly.
- Peeple follows safe recruitment practices as recommended by the OSCP and incorporates awareness of child safety and protection issues into all relevant staff training to ensure a safe environment for all children.

Staff responsibilities:

Staff have a responsibility to report internally concerns they have about any actions on the part of a staff member which threaten children's safety and well-being and communicate with the Local Authority Designated Officer (LADO).

Staff may perceive a conflict between the need to share information and the normal duty of confidentiality. However, disclosure of information without consent of the family will only take place discreetly and appropriately for the purpose of protecting a child from harm.

4. Communication with parents

Practitioners will inform parents/carers involved in any Peeple activity of their obligation to share internally any concerns they might have about a child's well-being.

Practitioners will inform parents/carers of the procedures and processes on how to report a concern themselves.

Notices, including posters and relevant contact details, will be displayed in all venues used by Peeples, including the Little Peeples Nursery, advising users about the safeguarding policy and procedures (unless covered by the venue or setting Peeples staff are working in).

Staff should strive to be open with parents/carers about their concerns. Every effort will be made to include the family in constructive discussions about concerns and any consultation or action taken, unless this is not in the best interests of the child.

The first concern will be the child. Children whose condition or behaviour has given cause for concern will be listened to, reassured and helped to understand that they themselves are valued and respected and have not been at fault.

Parents will normally be the first point of reference, but if they are not able to allay any legitimate anxieties, we will contact the MASH (Multi-Agency Safeguarding Hub) on 0345 0507666 (direct line). Referrals to the MASH can also be made using the MASH Enquiry Online Referral Form. The form should only be used by professionals to make new MASH enquiries.

5. Peeples internal procedures for protecting children from harm

Note: No member of staff should act alone. For serious cases requiring immediate referral, see also section 7 below.

As soon as any situation of concern about the safety or well-being of a child or unborn infant occurs, in the first instance:

1. Delivery staff should inform one of the Designated Officer or Leads.
2. Communication with the above should take place as soon as possible, ideally within the same working day and always within 24 hours.
3. The Practitioner together with the Designated Officer or Lead will make brief notes of their concerns. Records should be concise and should differentiate between opinion, personal values, hypothesis and factual record. They should include:
 - a. time
 - b. date
 - c. place
 - d. what was seen or heard or reported by someone else
 - e. people present
 - f. what action was taken and by whom
4. The Designated Lead will consult with the Designated Officer at the earliest opportunity.
5. Where an immediate referral is not considered appropriate, ongoing concerns regarding a child's welfare will be discussed with parents. An Early Help assessment is offered. A record must be kept of any Peeples or other services that Peeples has offered to that family or helped them to access. It is important to record services used by other children in the family,

particularly schools/pre-schools attended. If, after recording and monitoring, a decision is made to refer to the MASH the procedure for referral is set out below.

6. Staff voicing concerns will be kept informed of any action arising from their communication.

6. Making a referral

The Designated Officer will decide whether a referral is appropriate, and if in any doubt will seek advice from the MASH (Multi-Agency Safeguarding Hub) via a "named conversation" phone call. Other staff may also make "named conversation" phone calls but should ensure the Designated Officer knows they are doing this and gives their approval to the action taken including giving any name to the MASH.

Referrals will be made by the Designated Officer or any one of the Leads. Telephone numbers are in **Appendix 2**.

When making a referral always ask for the name of the Social Worker you are speaking to. The Social Worker will ask for the following information. If not all the information is available, do not delay in making the referral but give as much information as you can:

- Child's full name
- Date of birth
- Home address
- Ethnic origin
- Parents' names and contact numbers
- Any other children at home
- Name of school/pre-school that child attends and schools that any siblings attend
- Names of other professionals involved with the child e.g. GP
- Description of injuries and child's explanation for them
- Anything you have observed or been told by child or others. Try to be specific and include dates and times
- Any action you have taken so far
- What, if anything, you have said to the child's parents
- Ask Social Worker what you should/should not say to parents
- Record the referral, including date and time and any action to be taken

An Assessment and Referral Form must also be completed within 24 hours and forwarded to MASH Team. An acknowledgement of the receipt of this form should be received. If not, the Designated Officer or Lead making the referral should follow this up.

If a referral was the result of hearsay from a parent and proves unfounded, People needs to report back to the parent that procedure has been followed to allay concerns.

For details of procedures following referral, refer to Oxfordshire Safeguarding Children Partnership manual.

7. Urgent referrals

Actual physical injury, disclosure of abuse and severe neglect justifies an urgent referral. If the child needs urgent medical treatment, seek this first. For recognition of significant harm and definitions, signs of child abuse, please see Appendix 3 to this policy or section 1.1.3 of the manual on the website: www.oscp.org.uk.

If a staff member believes an urgent referral may be needed, they must contact one of the Designated Officers or Leads immediately. **DO NOT WAIT.**

The Designated Officer or Lead will discuss the concern with the parent or carer unless doing so will compromise the safety of the child. All discussions will be recorded on the Incident Report form.

The Designated Officer or Lead will then make the referral as a matter of urgency to the MASH or the Police Child Abuse Investigation Unit.

8. Suspicions/disclosure regarding abuse by a member of staff or volunteer

- All staff should take care not to place themselves in a vulnerable position with a child. It is always advisable for interviews or work with individual children or parents to be conducted in view of other adults.
- We understand that a child or young person may make an allegation against a member of staff. If such an allegation is made, the member of staff receiving the allegation will immediately inform the Safeguarding Officer or one of the Leads.
- The Safeguarding Officer or Lead on all such occasions will discuss the content of the allegation with the Designated Officer for the Local Authority (LADO), **before taking any action.** In Oxfordshire, contact should be made with the Education Safeguarding Advisory Team on 01865 810603 – full details of the team are in **Appendix 2.**

The procedures outlined in the sections above will be followed. In addition, any concerns/disclosure concerning a member of staff or a volunteer (including trustees) will be immediately reported to a Designated Officer or Lead who will inform the People CEO, or Chair of Trustees, as soon as possible. If the concern is regarding the Designated Officer or a Lead, another Lead or the Designated Officer should immediately inform the People CEO, or Chair of Trustees. All conversations must be recorded. A decision will be made to suspend if the member of staff or volunteer poses a significant risk to children and the relevant staff or volunteer Disciplinary Procedure will be followed.

In dealing with any allegations, the procedures on the OSCP website for dealing with “Allegations against Staff, Carers and Volunteers” will also be followed. Consideration will be given to the following 3 strands:

- The police investigation of a possible criminal offence
- Enquiries and assessment by the LADO (or equivalent department) as to whether the child is in need of protection or in need of services
- Consideration by People of disciplinary action against the individual

This section should also be read in conjunction with People's **Complaints Procedure** (available on the People website), which instructs staff on how to deal with complaints by parents, carers or other users of People services, and **Whistleblowing Policy** (available in the employee handbook).

9. Record keeping

Records should be clear and legible, signed and dated with specific reference to the circumstances in which the disclosure/observations took place. Records should be concise and record where possible what was happening prior to the behaviour/disclosure. Where possible record the child's or adult's own words.

You must record the following information:

- Date
- Time
- Place
- What was seen or heard by whom
- Person(s) present
- What action was taken and by whom

Records should be Relevant, Factual, Concise, Complete, Accurate, Objective, Dated, Signed, and Stored Securely.

People aims to offer a supportive environment for children, parents, staff and volunteers. Staff and volunteers need to be aware that recognising abuse, being informed about a safeguarding issue or receiving a disclosure is emotionally very challenging and stressful. Confidential systems are in place so that staff can discuss what support may be required.

All People staff and volunteers are expected to abide by the People Confidentiality Policy which is issued to all new staff and volunteers and signed by them.

10. Ensuring support for children

We recognise that a child who is abused, who witnesses violence or who lives in a violent environment may feel helpless and humiliated, may blame him/herself, and find it difficult to develop and maintain a sense of self-worth.

We accept that research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn.

Our setting and services will support all children and young people by:

- Encouraging the development of self-esteem and resilience in every aspect of life.
- Promoting a caring, safe and positive environment.
- Helping them to understand, respond to and calculate risk effectively, for example in relation to the specific types of abuse as stated on page 10.
- Being aware of the additional barriers that exist when recognising the signs of abuse and neglect of children who have special educational needs and/or disabilities.

- Meeting the needs of children who have special educational needs and/or disabilities.
- Liaising and working together with all other support services and those agencies involved in the safeguarding of children.
- Notifying Social Care as soon as there is a significant concern.
- Notifying Social Care when a child/young person attending the centre is privately fostered.
- Providing continuing support to a pupil (about whom there have been concerns) who leaves the setting by ensuring that such concerns and medical records are forwarded under confidential cover to the Designated Person at the child's new setting immediately.

11. People staff in venues/settings

People staff working in other settings should familiarise themselves with the setting's own safeguarding policy and action protocol and ensure that they know who is our Designated Officer and Leads for safeguarding.

12. Liaison with other agencies

The Designated Officer and Leads will take the lead in communications and consultation with outside agencies. Decisions about notifications and consultation with safeguarding personnel will be made by the Designated Officer and Leads in collaboration with the People CEO or Chair of Trustees in more serious cases.

People staff are issued with and expected to follow the "Seven Golden Rules for information sharing" leaflet produced by the OSCP and attached in Appendix 6.

13. Images of children on the People website and other media

While the People website contains images of children, careful steps have been put in place to protect children from abuse as a result of these images appearing. However, if there were any grounds for concern, the usual procedures and protocols, as described above, would apply. People will not use any images in publications, printed materials or on the website without signed parental consent.

14. Use of the internet

Our **Acceptable Use of the Internet Policy**, set out in a separate document, reflects the consideration we give to keeping children safe when they are using the internet.

Our **Online Video Conferencing and Groups Guidelines**, sets out in a separate document, the steps we take to ensure that online conferencing media such as Zoom are used in a way that safeguards children and families.

Appropriate filters and monitoring systems are in place to protect children from harmful online material.

15. Training and qualification activities

During People Training and Qualification activities, Tutors (Peep practitioners)/Assessors should refer to their employer's policies and procedures. Freelance trainers working for People should contact People's Safeguarding Officer or the National Training and Accreditation Manager should any concerns arise.

16. Legal framework

Primary legislation

Children Act 1989 – s 47

Protection of Children Act 1999

Care Act 2014

Children Act 2004 s11

Children and Social Work Act 2017

Safeguarding Vulnerable Groups Act 2006

Counter-Terrorism and Security Act 2015

General Data Protection Regulation 2018

Data Protection Act 2018

Modern Slavery Act 2015

Sexual Offences Act 2003

Serious Crime Act 2015

Criminal Justice and Court Services Act (2000)

Human Rights Act (1998)

Equalities Act (2006)

Equalities Act (2010)

Disability Discrimination Act (1995)

Data Protection Act (2018)

Freedom of Information Act (2000)

Legal references

Working Together to Safeguard Children (HMG 2023)

Statutory Framework for the Early Years Foundation Stage 2024

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

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

Keeping Children Safe in Education 2024

Education Inspection Framework (Ofsted 2024)

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

The Common Assessment Framework (2006)

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

Further guidance

Information sharing advice for safeguarding practitioners (DfE 2024)

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

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

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

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

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

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

Safeguarding Disabled Children: Practice Guidance (DfE 2009)

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

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

Handling Cases of Forced Marriage: Multi-Agency Practice Guidelines (HMG 2014)

17. Review and approval

This policy will be regularly reviewed and updated.

Last reviewed: May 2026

Changes: Online conferencing added under section 14 in April 2020

Next full review date: May 2027

Signed: 

Name: Sally Smith

Position: CEO