

Safeguarding

Date of Review: September 2026

Date of Next Review: September 2027

Version: 10.0

Safeguarding is the legal responsibility of all. This Policy applies to all stakeholders and to anyone on the premises.

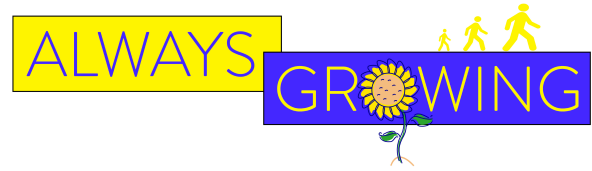
Directors Approval:

Lewis Fogarty

Ben Bausor

Key Documents:

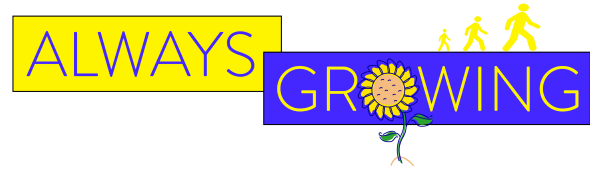
- 'What to do if you're worried a child is being abused' (HMG 2015).
- [Working Together to Safeguard Children](#)
- Dealing with Allegations of Abuse (DfE 2012)
- Equality Act (HM Gov 2010)
- Disqualification Under the Childcare Act. (2006)
- [Keeping Children Safe in Education](#)
- General Data Protection Regulations (2018) and Data (Use and Access) Act 2025
- [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children
- [Statutory guidance on the Prevent duty](#), which explains duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- [The Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#) (referred to in this policy as the "2018 Childcare Disqualification Regulations") and [Childcare Act 2006](#), which set out who is disqualified from working with children
- The Human Rights Act 1998
- This policy also meets requirements relating to safeguarding and welfare in the [statutory framework for the Early Years Foundation Stage](#).



Terms used in this policy:

- 'Always Growing' refers to any provision run by Always Growing Ltd.
- 'Children' refers to any registered child or young person attending Always Growing
- 'Staff' refers to all staff and volunteers
- 'Safeguarding team' refers to staff who have specific responsibilities for safeguarding
- 'Safeguarding' refers to the protecting children from maltreatment preventing impairment of children health and development, ensure the children have the provision of safe and effective care and taking action to enable all children to have the best outcomes.
- 'The Directors' refers to Lewis Fogarty and/or Ben Bausor or a nominated person who they have authorised to make decisions on their behalf.
- 'Parents' refers to parents, guardians, carers or anyone who has parental responsibility.

All policies are approved by the Directors of Always Growing Ltd, in line with the available guidance both Statutory and best practice. We envisage that these policies will apply to provision delivered by Always Growing Ltd. We review and update policies in a timely manner and endeavour to include statutory updates. In exceptional circumstances, for example a situation arising that is not covered by the policies below, the Directors will use their professional judgement to make the best possible decision in the circumstances. At all times, the Directors will keep in mind the needs and wishes of the child.



Key Contact Information:

Designated Safeguarding Lead:
Ben Bausor (07917885553)

Deputy Designated Safeguarding Leads:
Lewis Fogarty (07758225181)
Shakiba Ahmed (07815 890786)

Local Authority Designated Officer (LADO) Windsor and Maidenhead:
01628 683150 or 01628 683202 or 07774 332675
Out of Hours Service: 01344 786543

Local Authority Designated Officer (LADO) Slough:
01753 474053 or 07885 828387

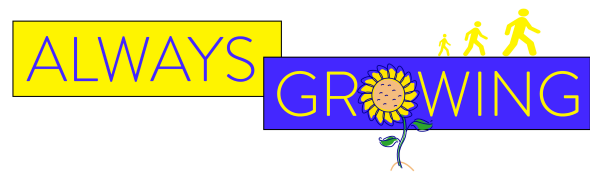
Local Authority Designated Officer (LADO) Hayes:
<https://www.hillingdon.gov.uk/LADO-Contact>

Social Services (Windsor and Maidenhead)
01628 683150 - Out of Hours Service: 01344 786543

Social Services (Slough)
01753 875362 -Out of Hours Service: 01344 786543

Social Services (Hayes)
01895 556 006

Key Contact Information:	3
Children's Rights and Entitlements	6
1. Introduction	6
2. Overall Aims and Rationale	6
3. Definitions	8
4. Equality Statement	9
5. Roles and Responsibilities	10
All Staff	10
The Designated Safeguarding Lead:	12
The Directors:	13
Virtual School Heads:	15
6. Confidentiality	15
7. Recognising Abuse and Taking Action	17
Safeguarding Babies and Pre-Verbal Children	17
Concerns arising during pregnancy	18
If a child is suffering or likely to suffer harm, or in immediate danger	18
If a child makes a disclosure to you	19
If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer harm, or in immediate danger)	20
Family Help	20
If you discover that FGM has taken place or a child is at risk of FGM	21
If you have concerns about extremism or radicalisation	21
If you have a mental health concern	23
If you have a concern about a staff member, supply staff, volunteer or contractor	23
Responding to an Allegation Against a Member of Staff	24
Allegations of abuse made against other children	25
Sharing of Nude or Semi-Nude Photos	26
Reporting Systems for Children	28
8. Involving Parents/Carers	29
9. Working with External Agencies	30
10. Always Growing's Role in Supporting Children	30



Children with Additional Needs	31
Children with Medical Needs	32
Looked After Children or Children Recently Looked After	32
11. Children in Specific Circumstances	33
Additional Safeguarding Policies	36
12. A Safer Culture - Safer Recruitment Policy	36
13. Whistle Blowing Policy	37
Introduction	37
Procedure	38
14. Physical Intervention Policy	38
15. Intimate Care Policy	39
16. Uncollected Child Policy	41
Introduction	41
Procedure	42
17. Missing Child Policy	43
Introduction	43
Response	43
Managing people	44
18. Use of Technology and Online Safety	45
Personal Mobile Phones	46
Cameras and videos	47
Use of ICT	47
Artificial Intelligence (AI)	49
Appendices	49
Appendix 1: Definitions and Indicators of Abuse	50
1. Neglect	50
2. Physical Abuse	50
3. Sexual Abuse	51
4. Emotional Abuse	52
5. Responses from Parents	53
6. Child Sexual Exploitation	53

Appendix 2 Logging a Concern:	55
Appendix 4: allegations of abuse made against staff	61
Section 1: Allegations that may meet the harms threshold	61
Section 2: concerns that do not meet the harm threshold	66

Children's Rights and Entitlements

1. Introduction

- 1.1. At Always Growing we promote children's right to be strong, resilient and listened to by creating an environment in our setting that encourages children to develop a positive self-image, which includes their heritage arising from their colour and ethnicity, their languages spoken at home, their religious beliefs, cultural traditions and home background.
- 1.2. We help children to establish and sustain satisfying relationships within their families, with peers, and with other adults.
- 1.3. We work with parents to build their understanding of, and commitment to, the principles of safeguarding all our children.
- 1.4. Safeguarding and keeping children safe is an important and fundamental aspect of all that we do in Always Growing. We expect all stakeholders to share these values which should ensure that children are treated with respect and dignity, feel safe, and are listened to as part of the being able to, Play. Learn. Smile.
- 1.5. Safeguarding overlaps a number of Always Growing policies, and these policies should be considered in terms of how they relate to safeguarding.
- 1.6. All policies which address issues of power and potential harm, for example: critical incident, behaviour and equal opportunities, will all be linked to ensure a consistent approach to safeguarding, and are reviewed by the Directors to ensure consistency
- 1.7. Always Growing is aware of its responsibilities under the Equality Act 2010, and this may relate to Safeguarding, particularly in supporting vulnerable groups

2. Overall Aims and Rationale

2.1. This policy will contribute to the prevention of abuse by:

- 2.1.1. Clarifying standards of behaviour for staff and children
- 2.1.2. Introducing appropriate activities within the curriculum and scope of Always Growing that promote a varied and balance curriculum whilst also promoting safeguarding
- 2.1.3. Provide opportunities for children to develop skills, concepts, attitudes and knowledge to promote their safety and well-being.
- 2.1.4. Developing staff awareness of the causes of abuse and making prompt referrals when abuse is suspected
- 2.1.5. Addressing concerns at the earliest possible stage

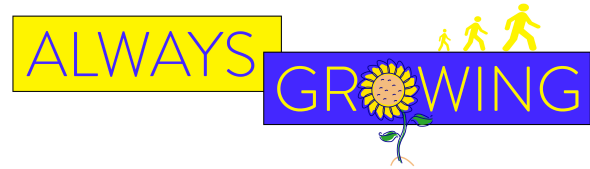
2.2. This policy will contribute to the protection of children by:

- 2.2.1. Including appropriate activities within the curriculum and scope of Always Growing that promote a varied and balance curriculum whilst also promoting safeguarding
- 2.2.2. Implementing Safeguarding policies and procedures
- 2.2.3. Working in partnership with children; parents and external agencies.
- 2.2.4. Referring to relevant government guidance when directing concerns about children in specific circumstances (e.g. children at risk from child sexual exploitation or radicalisation)
- 2.2.5. Supporting the recruitment process to prevent unsuitable candidates being employed
- 2.2.6. Creating a safeguarding culture where Safeguarding is at the heart of what we do

2.3. All children have a right not to be abused and to be protected from harm regardless of their race, religion, ethnicity, gender or sexuality. Always Growing's policy is to safeguard and promote the welfare of children and young people in our care.

2.4. Our objectives are to help keep young people safe by:

- 2.4.1. Providing a safe environment for young people to learn and be successful where they are protected from maltreatment
- 2.4.2. Preventing impairment of children's health or development
- 2.4.3. Identifying young people who are suffering or likely to suffer significant harm
- 2.4.4. Taking appropriate action, in a timely manner with the aim of making sure that they are kept safe both at home and at Always Growing to enable all children to have the best outcomes
- 2.4.5. Preventing unsuitable people from working in our environment, through our safer recruitment strategies



- 2.4.6. Listening and responding to the children's concerns in a timely way and making referrals for help as required
- 2.4.7. Working with external agencies to promote the safeguarding of children
- 2.4.8. Ensuring that staff are aware of their responsibilities to safeguard children, and receive appropriate training to do so

2.5. At Always Growing we place the safety and welfare of all children at the heart of our culture and ethos.

2.6. This will be promoted by:

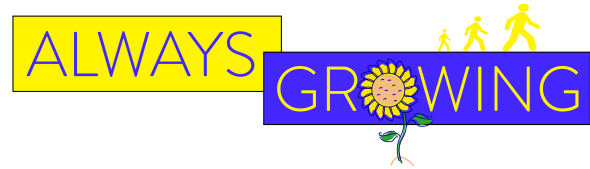
- 2.6.1. establishing an ethos in which children feel safe and secure, their viewpoints are valued, they are encouraged to talk and are listened to
- 2.6.2. support and guidance for children which matches their individual needs and developmental stages. This includes ensuring that they have a range of appropriate adults who they can approach if they are in difficulties
- 2.6.3. to develop awareness in all staff of their responsibilities in identifying abuse, and taking a proactive role in the prevention of abuse. This includes recognising that safeguarding issues could arise at any point in the day, term or year on-site, off-site, at Always Growing or at home. Staff must be alert to these issues at all times.
- 2.6.4. ensuring that all staff are aware of the referral procedures within Always Growing
- 2.6.5. Ensuring that all staff are aware of the referral procedures external to Always Growing
- 2.6.6. monitor children who have been identified as 'at risk'
- 2.6.7. ensuring that the appropriate outside agencies are involved
- 2.6.8. working with parents to build an understanding of Always Growing's responsibility to ensure the welfare of all children

3. Definitions

3.1. Safeguarding and promoting the welfare of children means:

- 3.1.1. providing help and support as soon as problems emerge;
- 3.1.2. protection from maltreatment inside or outside the home, including online;
- 3.1.3. promoting upbringing with birth parents or the family network/kinship care where possible
- 3.1.4. acting in the child's best interests.

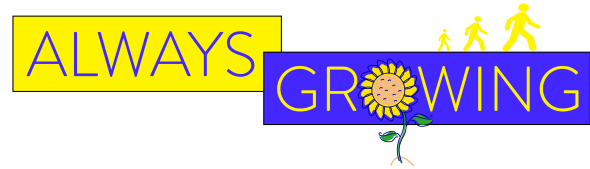
3.2. **Child protection** is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm. This includes harm that



occurs inside or outside the home, including in care environments and online. Effective safeguarding is anti-discriminatory, and anti-racist. Practitioners should be sensitive to factors including economic and social factors, ethnicity and disability which can impact children and families.

- 3.3.**Abuse** is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.
- 3.4.**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. Appendix 1 defines neglect in more detail.
- 3.5.**Making or sharing of nudes and semi-nudes** (known also as sexting or youth produced sexual imagery) is the sharing of sexual imagery (photos or videos) by children. This includes images that have been digitally altered or wholly generated using AI.
- 3.6.**Children** includes everyone under the age of 18.
- 3.7.The following **3 safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:
1. The local authority (LA)
 2. An integrated care board for an area within the LA
 3. The chief officer of police for a police area in the LA area
- 3.8.**Victim** is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim, or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.
- 3.9.**Alleged perpetrator(s)** and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis

4. Equality Statement



4.1. Some children have an increased risk of abuse, both online and off line and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face. Safeguarding practice by its nature will be anti-discriminatory and anti-racist, and all staff should challenge racism and discrimination. Assessments should recognise how economic/social circumstances, ethnicity, disability, trauma and previous experiences with services can affect families and professional relationships.

4.2. We give special consideration to children who:

- 4.2.1. Have special educational needs (SEN) or disabilities or health conditions
- 4.2.2. Are young carers
- 4.2.3. May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- 4.2.4. Have English as an additional language
- 4.2.5. Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- 4.2.6. Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- 4.2.7. Are asylum seekers
- 4.2.8. Are at risk due to either their own or a family member's mental health needs
- 4.2.9. Are looked after or previously looked after
- 4.2.10. Are absent from education and where a parent has expressed intention to withdraw them from the setting.

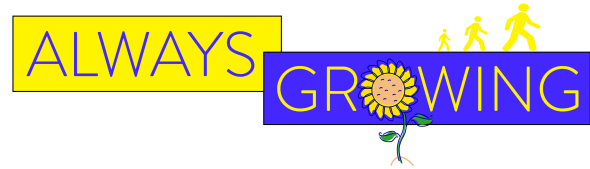
5. Roles and Responsibilities

Safeguarding and child protection is everyone's responsibility. This policy applies to all staff and volunteers, and is consistent with the up-to-date procedures. This policy applies both on site and off-site activities.

Always Growing plays a role in preventative education. This is in the context of our organisational approach to prepare children, a culture of zero-tolerance of sexism, misogyny/misandry, transphobia, homophobia, biphobia and sexual violence/harassment.

All Staff

5.1. All staff have a duty of care towards children they work with. They should take every precaution to protect them from harm. This includes, but is not limited to, the following points:



- 5.1.1. Deal with any disclosures calmly and within the guidance set out in this policy
- 5.1.2. Make professional judgements about behaviour when there is no specific guidance, to ensure the best interests and welfare of children.
- 5.1.3. Be careful about what is said, their physical contact with children and their actions, which should always be within the professional remit of their role.
- 5.1.4. Be aware of what to look for to identify children who need help or protection.
- 5.1.5. Report anything that makes them uncomfortable or concerned in any way. This includes concerns about any child or member of staff.
- 5.1.6. Understand the processes for making a referral when a safeguarding issue is identified
- 5.1.7. Understand how to make a referral themselves to the LADO or Social Care team
- 5.1.8. Understand the universal/community based early help and Family Help processes which includes identifying emerging problems, liaising with the DSL and sharing information when necessary. This includes awareness of local referral routes and contributing to Family help assessments and plan where required.
- 5.1.9. Be discreet but never promising confidentiality, respecting a child's privacy. Staff will need to treat information in a confidential way, but ensure that information is shared in a timely way when required, to those who need to know
- 5.1.10. Be subject to safer recruitment processes and checks whether they are new staff, supply staff, contractors, volunteers etc.
- 5.1.11. Completing safeguarding training at least once a year and re-familiarise themselves with the policies and procedures before beginning work at Always Growing.
- 5.1.12. Be alert to the signs of abuse (physical, sexual, emotional, neglect), mental health needs. self-harm, pregnancy, concerns about possible 'forced' marriages, female genital mutilation, children at risk of being influenced by extremism/ radicalisation and young carers at risk of socio-economic factors which may affect their development.
- 5.1.13. Be alert to specific safeguarding issues, such as:
 - 5.1.13.1. Child-on-Child abuse

- 5.1.13.2. Child Sexual Exploitation
- 5.1.13.3. Child Criminal Exploitation
- 5.1.13.4. Modern slavery
- 5.1.13.5. Indicators of being at risk from serious violent crime
- 5.1.13.6. FGM
- 5.1.13.7. Radicalisation
- 5.1.13.8. The risks associated with online abuse

5.1.14. Understand the importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe

5.1.15. Inform the Directors about any situations or factors that could affect their ability to work with children. All staff must declare any anything information or changes that a DBS check would be up.

5.2. All staff will read and understand Part 1 of the Department for Education's statutory Safeguarding Guidance, and will review this at least annually.

5.3. The expectations laid out in this policy, this should be considered in addition to the Staff Code of Conduct policy and other relevant policies.

5.4. Always Growing recognises the stressful and traumatic nature of Safeguarding work and supports staff by providing an opportunity to talk through their anxieties with a member of the Safeguarding team and to seek further support as appropriate.

5.5. All concerns relating to safeguarding adults at Always Growing should be referred to the Safeguarding team. This can be wide ranging in scope, from concerns about their well-being, mental or physical health, behaviour conduct or specific Safeguarding concerns

The Designated Safeguarding Lead:

5.6. The Designated Safeguarding Lead with lead responsibility, management and oversight is Ben Bausor. As Directors of Always Growing this responsibility also lies with, and is shared with Lewis Fogarty.

5.7. Key Responsibilities of the DSL:

- 5.7.1. Co-ordinate all safeguarding activity
- 5.7.2. Sign off on all reports before they are shared externally to Always Growing
- 5.7.3. Provide advice and support to staff on child welfare and child protection matters

- 5.7.4. Take part in strategy discussions and interagency meetings
- 5.7.5. Delegate attendance at strategy and other meetings to other staff
- 5.7.6. Contribute to the assessment of children
- 5.7.7. Refer suspected cases as appropriate to the relevant body and support staff who make a direct referral
- 5.7.8. Have an understanding of harmful sexual behaviour
- 5.7.9. Know what local support is available to support children involved in sexual violence and sexual harassment
- 5.7.10. Be aware the children may need an appropriate adult to support them in police investigation and searches

5.8. Where there is a concern about a child, the Designated Safeguarding Lead (DSL) will meet with the safeguarding team to decide on the appropriate course of action, if possible. If this isn't possible then the DSL will seek advice from the LADO directly or social services.

5.9. When a Designated Safeguarding Lead resigns their post or no longer has safeguarding responsibility, there should be a full face to face handover/exchange of information with the new post holder.

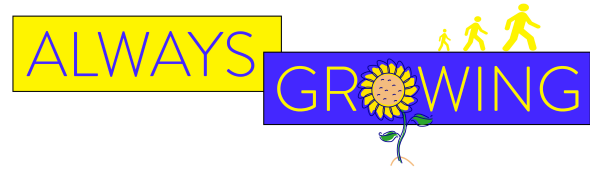
5.10. Always Growing has a number of staff members who have undertaken DSL training. In the event the the DSL is unavailable, cover will be provided by one of the Deputy DSLs, Lewis Fogarty or Shakiba Ahmed. These three staff will work together to ensure that at least one of them is available at all times to provide support. In the very unlikely event that all three staff are unavailable, staff will be able to contact one of the staff who holds DSL training.

5.11. Staff availability should not delay escalation of concerns, and all staff are reminded if needed they can approach social care directly for advice and guidance.

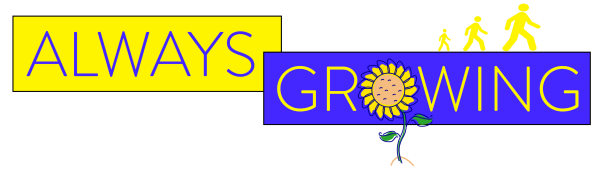
The Directors:

5.12. The Directors will ensure that Always Growing:

- 5.12.1. Has a safeguarding policy written in accordance with the current government Safeguarding guidance, which reflects a whole-setting approach to safeguarding.
- 5.12.2. Ensure that there is an evaluation and review of all safeguarding policies and procedures at least annually



- 5.12.3. Has a Designated Safeguarding Lead who is available to provide support and guidance on child protection matters, contribute to the assessment of children and make referrals to the relevant agency when required
- 5.12.4. Operates safer recruitment procedures and ensures appropriate checks are carried out on all new staff and relevant volunteers
- 5.12.5. Ensures that the safeguarding team attends appropriate refresher training
- 5.12.6. Ensures that all staff who work with children undertake training at least at yearly intervals, with updated content in line with changes to legislation
- 5.12.7. Ensures that all staff, including temporary staff, contractors and volunteers and visitors are made aware of the Always Growing's arrangements for safeguarding and their responsibilities, particularly with how referrals of suspected abuse and neglect are made.
- 5.12.8. Remedies any deficiencies or weaknesses brought to their attention without delay
- 5.12.9. Have procedures for dealing with allegations of abuse against staff/ volunteers
- 5.12.10. In the provision of extended facilities, directly under the supervision or management of Always Growing staff, the arrangements for safeguarding as written in this policy shall apply
- 5.12.11. Where services or activities are provided separately by another body, Always Growing will seek assurances that the body concerned has appropriate policies and procedures in place for safeguarding children and there are arrangements to liaise with Always Growing on these matters where appropriate.
- 5.12.12. Will communicate this policy and ensure it is displayed on the website
- 5.12.13. Manage the case in the event that an allegation of abuse is made against another member of staff or volunteer when appropriate
- 5.12.14. Ensure that relevant staffing ratios are met, where applicable to the EYFS
- 5.12.15. Ensure that children in the Early Years Foundation Stage is assigned a Key Person



5.12.16. Make decisions regarding all low-level concerns, in collaboration with the DSL

Virtual School Heads:

5.13. Virtual school heads have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of pupils with a social worker. They should also identify and engage with key professionals, e.g. DSLs, SENCOs, social workers, mental health leads and others.

6. Confidentiality

6.1. Safeguarding information will be dealt with in a confidential manner. Information will only be given out on a strictly need to know basis, and must be treated as restricted/confidential.

6.2. Staff will be informed of relevant details only when the staff responsible for Safeguarding feels their having knowledge of a situation will improve their ability to deal with an individual child and/or family.

6.3. Safeguarding records will be stored securely in a central place separate from other records. Individual files will be kept for each child; Always Growing will not keep family files. Files will be kept for at the least the period during which the child is attending Always Growing, and beyond that we would seek advice on how long to keep our records for, referring to our Information and Records Retention Policy

6.4. Records will include:

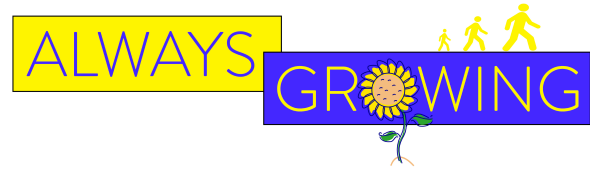
6.4.1. Clear and comprehensive summary of the concern

6.4.2. Details of how the concern was followed up and resolved

6.4.3. Notes of any action taking, decisions reached and the outcome

6.5. Access to these records by staff other than by the staff responsible for safeguarding will be restricted.

6.6. Parents will be aware of information held on their children and kept up to date regarding any concerns or developments by the appropriate members of staff. Information will not be shared with parents if it is felt that this increases the risk of harm for children.



6.7.If required, safeguarding records will be forwarded on to the relevant organisation. If sending by post child/staff records will be sent by “special/recorded delivery” for audit purposes a note of all child/staff records transferred or received should be kept in either paper or electronic format. This will include the name, date of birth, where and to whom the records have been sent, the date sent and/or received.

6.8.With regards to confidentiality, staff should be mindful of the following points:

- 6.8.1.Timely information sharing is essential to effective safeguarding
- 6.8.2.Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children
- 6.8.3.The Data Protection Act (DPA) 2018 , Data (Use and Access) Act 2025 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe, and further guidance can be found within the GDPR policy
- 6.8.4.If staff need to share ‘special category personal data’, the DPA 2018 contains ‘safeguarding of children and individuals at risk’ as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk
- 6.8.5.Sharing decisions should be lawful, necessary, proportionate and timely, and material decisions about sharing vs not sharing should be recorded.
- 6.8.6.Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child’s best interests
- 6.8.7.The government’s [information sharing advice for safeguarding practitioners](#) includes 7 ‘golden rules’ for sharing information, and will support staff who have to make decisions about sharing information
- 6.8.8.If staff are in any doubt about sharing information, they should speak to the designated safeguarding lead (or deputy)

6.9.With regards to anonymity, staff should be mindful of the following points:

- 6.9.1. Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
- 6.9.2. Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved
- 6.9.3. Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims’ identities

7. Recognising Abuse and Taking Action

7.1. Safeguarding Procedure checklist for staff.

If:

- a child discloses abuse either by an adult or another child
- a member of staff suspects a child may have been abused
- A member of staff is concerned about the behaviour of another staff member
- a third party expresses concern
- a staff member witnesses an abusive situation involving another staff member, adult or a child
- a child reports persistent bullying

the member of staff should: RECORD and REPORT

- R Respond without showing any signs of disquiet, anxiety or shock
- E Enquire casually about how an injury was sustained or why a child appears upset
- C Confidentiality must not be promised to children or adults in this situation
- O Observe carefully the demeanour or behaviour of the child
- R Record in detail what has been seen and heard. Make sure this is factual, in the child's own words and not your own opinion
- D Do not interrogate or enter into detailed investigations: rather encourage the child to say what they want until enough information is gained to decide whether or not a referral is appropriate.

Then REPORT to the Safeguarding Team without delay. A template for recording concerns is in the appendix

Members of staff should not

- investigate suspected/alleged abuse themselves
- evaluate the grounds for concern
- seek or wait for proof
- discuss the matter with anyone other than the Safeguarding Team

Safeguarding Babies and Pre-Verbal Children

Always Growing recognises that babies and pre-verbal children are not necessarily able to communicate their needs in the same way as older children might be able to share things. Staff working with babies and pre-verbal should have close regard to:

- non-verbal/pre-verbal cues
- closely observe interactions with parents
- maintain professional curiosity when depending on an adults account
- recognise feeding, sleeping, weight/development changes, unexplained injuries and withdrawal as possible indicators
- consider all significant adults involved in the child's care

Concerns arising during pregnancy

Always Growing recognises that concerns for a child's welfare may arise during pregnancy. This may require early pre-birth assessment, information sharing and referral, including where there is a reason to believe the baby may suffer significant harm after birth.

If a child is suffering or likely to suffer harm, or in immediate danger

- 7.2. Tell the DSL as soon as possible so that an immediate referral can be made to Social Services and/or the police.
- 7.3. Any member of staff can make a referral, and they should follow up with the DSL if they do so.
- 7.4. When making a referral, staff should contact the relevant Social Services, based on where the child lives. The contact information and links to the referral form can be found below. Staff should telephone the relevant social services before sending the form in to ask for advice and guidance:

For Slough:

Front Door Hub 01753 875362 (9 am - 5 pm). Out of hours: 01344 786543

Link to Multi Agency Referral Form (MARF):

<https://www.scstrust.co.uk/multi-agency-referral-form-v3-3/>

Email to:

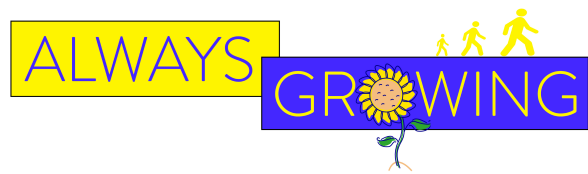
sloughchildren.referrals@scstrust.co.uk

For Windsor and Maidenhead:

Single Point of Access 01628 683150. Out of hours 01344 786543

Link to Multi Agency Referral Form:

https://www3.rbwm.gov.uk/forms/form/405/en/multi_agency_safeguarding_hub_mash_referral



For Hayes:

Stronger Families Hub 01895 556006 (24/7)

Link to referral form: <https://portal-ehm.hillingdon.gov.uk/web/portal/pages/ehassess#ssa>

strongerfamilieshub@hillingdon.gov.uk

If a child makes a disclosure to you

7.5. All staff should be aware that a child may make a disclosure to them at any time. All disclosures of abuse should be dealt with in the same way whether it is against a staff member, another adult or a child.

7.6. If a child tells a member of staff about possible abuse their statements should not be dismissed or ignored. It should be made clear to the child that confidentiality cannot be guaranteed with respect to Safeguarding issues.

7.7. On hearing an allegation or complaint from a child the member of staff should:

7.7.1. Listen to and believe the child. Allow them to talk freely

7.7.2. Limit their questioning to the minimum necessary for clarification. Staff should ask for help if needed.

7.7.3. Avoid leading questions.

7.7.4. Use TED strategies. Tell me... Explain... Describe... to help manage the disclosure process.

7.7.5. Focus on that the child has done the right thing in telling you, rather than saying they should have said sooner

7.7.6. Explain that the information will need to be passed on to the DSL

7.7.7. A full record of conversations should be made, in the child's words. This should be factual and recorded on the form in the Appendix.

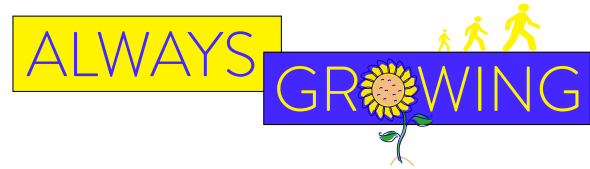
7.7.8. Pass the details of the disclosure onto the DSL. In the absence of the DSL, the Deputy DSL should be contacted

7.7.9. If none of these staff are available, and the staff member feels that the child is in immediate danger, then the staff member should contact the police

7.7.10. Safeguarding information should be kept confidential and not disclosed unless told to do so by a relevant authority in the safeguarding process

7.8. If a member of staff feels that a child is suffering, or likely to suffer from or in immediate danger, they must inform the DSL as soon as possible in order to make a referral

7.9. Some children may:



7.9.1. Not feel ready or know how to tell someone that they are being abused, exploited or neglected

7.9.2. Not recognise that their experiences are harmful

7.9.3. Feel embarrassed, humiliated or threatened

7.10. None of these facts should prevent staff from discussing concerns with the DSL

If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer harm, or in immediate danger)

7.11. Where possible, speak to the DSL first to agree a course of action. If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken.

7.12. Speak to a member of the senior leadership team and/or take advice from local authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000.

7.13. Make a referral to local authority children's social care directly, if appropriate. Share any action taken with the DSL as soon as possible.

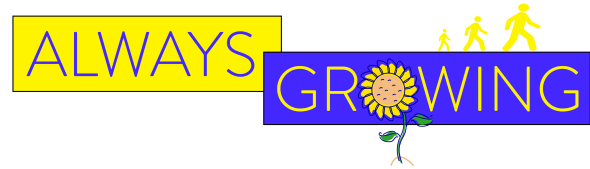
Family Help

7.14. If Family Help is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

7.15. The DSL will keep the case under constant review and will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

7.16. If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so. If you make a referral directly, you must tell the DSL as soon as possible.

7.17. The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the



local authority if this information is not made available, and ensure outcomes are properly recorded.

7.18.If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

If you discover that FGM has taken place or a child is at risk of FGM

7.19.FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".

7.20.FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.

7.21.Possible indicators that a child has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in the appendix.

7.22.Any member of staff who discovers that an act of FGM appears to have been carried out on a child under 18 must speak to the DSL and follow our local safeguarding procedures. Staff should not examine children.

7.23.Any member of staff who suspects a child is *at risk* of FGM or suspects that FGM has been carried out must speak to the DSL and follow our local safeguarding procedures.

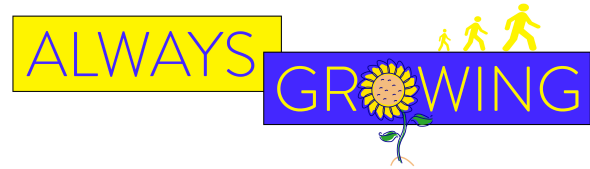
If you have concerns about extremism or radicalisation

7.24.If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.

7.25.If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care.

7.26.Make a referral to local authority children's social care directly, if appropriate

7.27.Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include [Channel](#), the



government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team.

7.28. The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which staff and governors can call to raise concerns about extremism with respect to a pupil. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

7.29. In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

7.29.1. Think someone is in immediate danger

7.29.2. Think someone may be planning to travel to join an extremist group

7.29.3. See or hear something that may be terrorist-related

7.30. Vulnerability indicators can be considered in three dimensions – engagement with the group, cause or ideology, intent to cause harm and capability to cause harm

7.31. Indicators of vulnerability across the three dimensions:

Engagement:

- Spending time with suspected extremists
- Changing appearance in line with group
- Day-to-day behaviour associated with extremist ideology
- Loss of interests and friends in activities not associated with extremist ideology
- Possession of material or symbols associated with an extremist cause
- Attempts to recruit others
- Communications with other that suggest identification with a group, cause or ideology

Intention:

- Identifying another group as threatening
- Blaming a group for causing all social or political ills
- Using insulting or derogatory names or labels for other groups
- Speaking about imminence of harm from other groups
- Expressing attitudes that justify offending on behalf of the group
- Condoning or supporting violence or harm towards others
- Plotting or conspiring with others

Capability:

- History of violence
- Criminally versatile
- Occupational skills or technical expertise

- 7.32. Always Growing recognises that not all of these examples may be applicable, but should be used in order to identify children who may be at risk of radicalisation. We also recognise that for younger children there is likely to be a lower risk of them directly being involved in radicalisation, but will be aware of the implications of other family members, such as parents/carers, family or extended family members becoming involved with radicalisation.
- 7.33. If a member of staff has concerns about a child or family and there may be a potential risk of radicalisation, this should be reported to the Safeguarding team
- 7.34. Racist incidents, either one-off or repeated may constitute a child-protection issue. All racist incidents are recorded and monitored.
- 7.35. Misinformation, disinformation and conspiracy theories could all be considered as safeguarding issues.

If you have a mental health concern

- 7.36. 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.
- 7.37. Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.
- 7.38. If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the procedures.
- 7.39. If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree a course of action.

If you have a concern about a staff member, supply staff, volunteer or contractor

- 7.40. Although it is an uncomfortable thought, it needs to be acknowledged that there is the potential for staff to abuse children.
- 7.41. All staff working within Always Growing must report any potential safeguarding concerns about an individual's behaviour towards children and young people immediately and without delay.

- 7.42. Whistle blowing, Allegations or concerns about colleagues and visitors, must be reported to the Directors unless the allegation or concern relates to one of the Directors. This policy outlines the process for managing allegations against a member of staff
- 7.43. If the concern relates to one of the Directors, it should be reported to the other Director. Alternatively, it can be immediately reported to the Local Authority Designated Officer (LADO) in Children's Social Care: 01628 683194.
- 7.44. Reports can be made directly to the LADO where there is a belief that there is a conflict of interest in reporting a concern or allegation about a member of staff, supply staff, volunteers or contractor.
- 7.45. The LADO has duties under section 11 of the Children Act (2004) to manage allegations against people who work with children in a paid or unpaid capacity. The LADO is involved from the initial phase of the allegation through to the conclusion of the case in line with section 18 of this policy document. The LADO is available to discuss any concerns and assist in deciding what action is needed to protect a child.
- 7.46. Always Growing will liaise with the LADO in managing allegations against staff. Communication with the LADO will be managed by the Directors, unless 15.5 applies

Responding to an Allegation Against a Member of Staff

- 7.47. This procedure should be used in any case in which it is alleged that a member of staff, visiting professional, volunteer or contractor has:
- 7.47.1. Behaved in a way that has harmed a child or may have harmed a child;
 - 7.47.2. Possibly committed a criminal offence against or related to a child; or
 - 7.47.3. Behaved in a way that indicates s/he is unsuitable to work with children.
- 7.48. The following action should be taken.
- 7.48.1. Ask the party making the complaint, disclosure or allegation to make a written statement outlining the complaint. This should make it clear exactly what the allegation is in as much detail as possible. It may be necessary to support the person to make a statement, for example, if the disclosure comes from a child.

7.48.2. Once the statement has been written and signed, the Directors should contact the LADO as soon as possible to establish the course of action. This should be prior to carrying out any investigation.

7.48.3. After contacting the LADO, the matter should be referred to OFSTED as soon as possible, but within 14 days

7.48.4. The Directors will follow advice from the LADO and OFSTED in managing the situation. There could be a number of possible outcomes, including no further action, a full investigation, a strategy meeting with relevant agencies to decide the next steps.

7.48.5. During an investigation it may be necessary to suspend an employee. Before doing so we will seek advice from the relevant agencies. When an employee is suspended, we will work with agencies to bring about speedy resolution to the matter and keep the employee informed in line with the agreement of the external agencies

7.48.6. At the end of the investigation, a summary report will be written and submitted to OFSTED

Allegations of abuse made against other children

7.49. Staff should be aware that abuse can also be child-on-child, and should not dismiss this as a part of growing up or 'banter'. Abuse will never be tolerated or passed off as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils. We also recognise the gendered nature of child-on-child abuse (i.e. that it is more likely that girls will be victims and boys perpetrators). However, all child-on-child abuse is unacceptable and will be taken seriously. Furthermore, it is also preventable, and a safeguarding matter for both the child harmed and the child displaying harmful behaviour.

7.50. Always Growing has an anti-bullying approach, which is separate to the safeguarding policy. However, incidents of bullying may be considered under safeguarding procedures. This includes all forms of bullying. Staff should be particularly aware of when child-to-child bullying could be constituted as abuse.

7.51. Most cases of children hurting other children will be dealt with under our behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. Within Always Growing, we would require a developmentally informed assessment of sexualised/harmful behaviour, rather than automatically labelling a young child as a perpetrator.

7.52. This might include where the alleged behaviour:

- 7.52.1. Is serious, and potentially a criminal offence
- 7.52.2. Could put children at risk
- 7.52.3. Is violent
- 7.52.4. Involves drugs or alcohol
- 7.52.5. Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including sharing of nude or semi-nude photos)

7.53. If a child makes an allegation of abuse against another child:

- 7.53.1. You must record the allegation and tell the DSL, but do not investigate it
- 7.53.2. The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- 7.53.3. The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed
- 7.53.4. The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

7.54. We will minimise the risk of child-on-child abuse by implementing the following steps. We are aware that not all steps will be appropriate for all areas of our provision and will depend on the age and stage of children:

- 7.54.1. Challenging any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images
- 7.54.2. Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female children, and initiation or hazing type violence with respect to boys
- 7.54.3. Ensuring we help to educate children about appropriate behaviour and consent where this is appropriate to their developmental stage
- 7.54.4. Ensuring children know they can talk to staff confidentially if needed
- 7.54.5. Ensuring staff are trained to understand that a child harming a child could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy

Sharing of Nude or Semi-Nude Photos

7.55. We are aware that sharing of nude or semi-nude photos may not directly affect the children in our care, however, we consider this an important aspect for staff to be aware of to promote awareness of how this may impact in the wider family

7.56. If you are made aware of an incident involving sharing of nude or semi-nude photos (also known as 'youth produced sexual imagery'), you must report it to the DSL immediately.

7.57. You must **not**:

7.57.1. View, copy, print, share, store or save the imagery yourself, or ask a someone to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)

7.57.2. Delete the imagery or ask to delete it

7.57.3. Ask the whoever is involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)

7.57.4. Share information about the incident with other members of staff, the children it involves or their, or other, parents and/or carers

7.57.5. Say or do anything to blame or shame any young people involved

7.58. You should explain that you need to report the incident, and reassure the child that they will receive support and help from the DSL.

7.59. Following a report of an incident, the DSL will hold an initial review meeting and aim to determine:

7.59.1. Whether there is an immediate risk to the child

7.59.2. If a referral needs to be made to the police and/or children's social care

7.59.3. If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)

7.59.4. What further information is required to decide on the best response

7.59.5. Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)

7.59.6. Whether immediate action should be taken to delete or remove images or videos from devices or online services

7.59.7. Any relevant facts about the children involved which would influence risk assessment

7.59.8. If there is a need to contact another school, college, setting or individual

7.59.9. Whether to contact parents or carers of the children involved (in most cases parents/carers should be involved)

7.60. The DSL will make an immediate referral to police and/or children's social care if:

- 7.60.1. The incident involves an adult
- 7.60.2. There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
- 7.60.3. What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- 7.60.4. The imagery involves sexual acts and any child in the images or videos is under 13
- 7.60.5. The DSL has reason to believe a child is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

7.61. If none of the above apply then the DSL, in consultation with other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

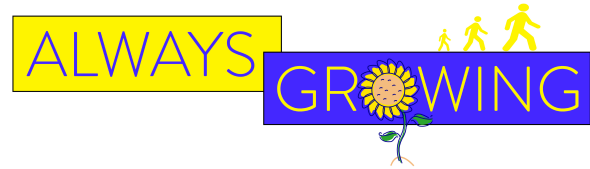
7.62. If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks.

7.63. The DSL will inform parents at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the child at risk of harm.

7.64. All incidents involving sharing of nude or semi-nude photos and the decisions made in responding to them will be recorded. The record-keeping arrangements set out in section 14 of this policy also apply to recording incidents of sharing of nude or semi-nude photos. Every incident will receive a safeguarding response.

Reporting Systems for Children

7.65. Where there is a safeguarding concern, we will take the child's wishes and feeling into account when determining what action to take and what services to provide. The age and stage of development of each child is likely to impact how their views can be taken into consideration and some children may not be capable of doing this independently.



7.66. We recognise the importance of ensuring all children feel safe and comfortable and that they are able to report concerns and allegations where they are able to do so based on their age and stage of development

8. Involving Parents/Carers

8.1. Always Growing recognises and values the contribution parents and carers can make

8.2. Where there is a lawful basis for doing so, information sharing with other agencies will happen without seeking consent from parents. This will apply to safeguarding referrals and information sharing requests. Where it is appropriate to do so, parents will be informed and engaged with when it is safe to do so, but a lack of consent must not delay action to safeguard. Voluntary Family Help is different, and consent is required for this service.

8.3. Staff should only approach parents/carers after consultation with the Designated Safeguarding Lead or member of the safeguarding team. Staff should keep a record of the conversation, and discuss with a member of the safeguarding team.

8.4. No disclosure must be made to a parent if this would put the child at risk of significant harm.

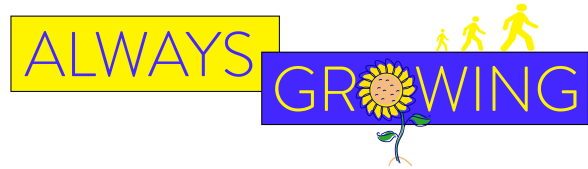
8.5. There may be occasions when Always Growing will contact another agency before informing parents/carers because it considers that contacting parents may increase the risk of significant harm to the child. Always Growing recognises that this can be distressing, however it is important to emphasise the overriding need to safeguard the child at all times.

8.6. Where allegations of abuse are made against other children, we will normally notify the parents of all children involved.

8.7. Where appropriate, along with any relevant agencies, Always Growing may arrange to meet with victim's parents or carers to discuss what is being put in place to safeguard them and understand their wishes and what support is needed.

8.8. Where appropriate, along with any relevant agencies, Always Growing may arrange to meet with alleged perpetrator's parents or carers to discuss what is being put in place to safeguard them and the impact that these decisions may have.

8.9. Always Growing's safeguarding policy is available to parents/carers on request. A copy of the policy is on the website, and parents are encouraged to read the policy when



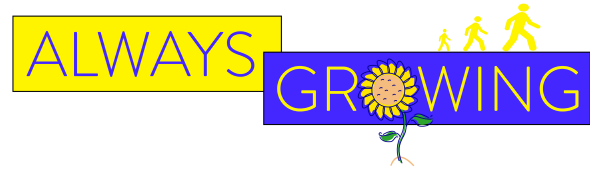
registering. Information about the safeguarding team is made available to parents through the information board, and parents are encouraged to discuss any concerns they have with the team.

9. Working with External Agencies

- 9.1. Always Growing will work cooperatively in partnership with a range of other agencies in the best interests of the children.
- 9.2. Always Growing will, where necessary, make referrals to Children's Social Care. Referrals should usually only be made by a member of the Safeguarding team. Any staff member can make a referral to social care, however, it is anticipated that they will consult with the safeguarding team before doing so.
- 9.3. Staff also have a right to contact the LADO if they feel that a safeguarding incident has not been managed appropriately. Again, it is anticipated that they will liaise with the safeguarding team before doing this. Although all staff are all made aware the direct referral option is available to them.
- 9.4. A member of the Safeguarding team may also contact Children's Social Care for advice about a specific case. Should Children's Social Care require a referral based on the information provided, staff will cooperate fully with this request.
- 9.5. Where the child already has a social worker, the request for support should go immediately to the social worker involved, or in their absence to their practice supervisor or team manager.
- 9.6. Always Growing will follow up all requests made to social care, and will seek to refer the matter to more senior staff within Children's Social Care should the matter not be satisfactorily resolved.
- 9.7. Always Growing will co-operate with any Safeguarding enquiries conducted by Children's Social Care. This will follow the policies and procedures outlined by the local authority within their resolving professional disagreements about safeguarding children escalation policy. Always Growing will raise matters by following this policy when it is felt that a situation hasn't been handled well, or warrants further investigation

10. Always Growing's Role in Supporting Children

- 10.1. Always Growing will offer appropriate support to individual children who have experienced abuse or who have abused others.



10.2.Children and young people who abuse others will be responded to in a way that meets their needs as well as protecting others within the Always Growing community through a multi-agency risk assessment.

10.3.Always Growing will ensure that the needs of children and young people who abuse others will be considered separately from the needs of their victims.

10.4.We will ensure that Always Growing works in partnership with parents/carers and other agencies as appropriate.

10.5.Always Growing will ensure that there are systems in place for children to express their views and feelings and give feedback.

Children with Additional Needs

10.6.Always Growing recognises that while all children have a right to be safe, some children may be more vulnerable to abuse, for example those with a disability, special educational need or certain health condition, those living with domestic violence or drug/alcohol abusing parents, etc.

10.7.Children who have additional needs are three times more likely to be abused than children with no additional needs.

10.8.When supporting children where this applies, consideration will be given to extraneous factors which may mean the child needs additional support. This includes:

10.8.1.Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration

10.8.2.Children being more prone to child group isolation than other pupils

10.8.3.The potential for children with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs

10.8.4.Communication barriers and difficulties in overcoming these barriers

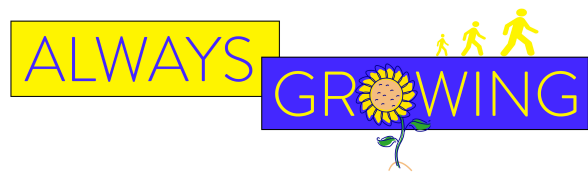
10.8.5.A child may not understand that what is happening is abuse

10.8.6.Children with SEN may have greater dependency on adults

10.8.7.There may be additional vulnerability associated with increased intimate care or isolation from others

10.8.8.Cognitive difficulties distinguishing fact from fiction online

10.9.Any abuse involving children with SEN will require close working with the SENCO.



10.10. We offer extra support for children with SEN and Disabilities including personalised support plans when needed

Children with Medical Needs

10.11. Always Growing has a separate policy on managing the health and medical needs of all children. Medical incidents or needs in themselves are not automatically safeguarding, but repeated failure to provide essential medication, withholding relevant medical information, or circumstances suggesting the condition increases vulnerability to neglect, abuse, or exploitation should trigger safeguarding consideration.

10.12. Certain medical needs will mean that children are defined as being disabled, as defined by the Equality Act, 2010. In addition, a child's medical needs may also be considered as Special Educational Needs (SEN). Where this is the case, Always Growing will seek guidance from relevant professionals and will comply with statutory duties,

10.13. Always Growing will put in place support for each child on an individual basis, taking into account the individual needs and support as required. This will include supporting staff to manage these needs, such as appropriate training.

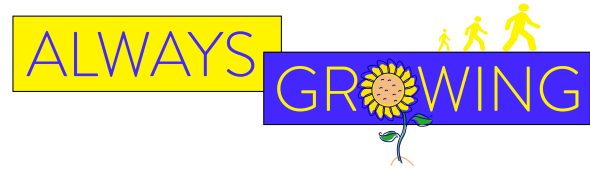
10.14. Children requiring First Aid will be given attention from trained staff. A written record of all first aid administered will be kept on an accident form. When there is any doubt about a child's welfare or if further medical intervention is required, parents will be contacted and an ambulance requested if necessary prior to that. If this is the case procedures laid out in the Health Policy will be followed.

10.15. Always Growing will dispense medicine in line with the Health policy.

Looked After Children or Children Recently Looked After

10.16. Always Growing are committed to providing quality provision based on equality of opportunity for all children and their families. All staff in our provision are committed to doing all they can to enable looked after children in their care to achieve and reach their full potential.

10.17. Children become looked after if they have either been taken into care by the local authority, or have been accommodated by the local authority (a voluntary care arrangement). Most looked after children will be living in foster homes, but a smaller



number may be in a children's home, living with a relative or even placed back home with their natural parent(s).

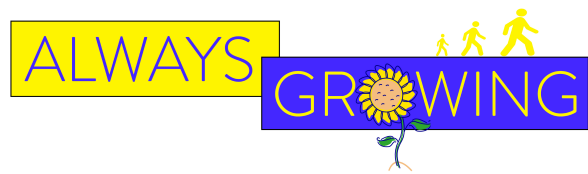
- 10.18. We recognise that children who are being looked after have often experienced traumatic situations; physical, emotional or sexual abuse or neglect. However, we also recognise that not all looked after children have experienced abuse and that there are a range of reasons for children to be taken in to the care of the local authority.
- 10.19. The term looked after child denotes a child's current legal status; this term is never used to categorise a child as standing out from others.
- 10.20. Where a child who normally attends our setting is taken into care and is cared for by a local foster carer, we will continue to offer the placement and further support for the child.
- 10.21. The designated person for looked after children is the Designated Safeguarding Lead. They have the following responsibilities:
- 10.21.1. Ensure that relevant staff have the information, support and training necessary to meet the looked after child's needs.
 - 10.21.2. Liaises with agencies, professionals and practitioners involved with the child and his or her family and ensure that appropriate information is gained and shared.
- 10.22. Always Growing recognises the role of the local authority children's social care department as the child's corporate parent and the key agency in determining what takes place with the child. Nothing changes, especially with regard to the birth parents or foster carer's role in relation to the setting, without prior discussion and agreement with the child's social worker.
- 10.23. Concerns about the child will be noted in the child's file and discussed with the foster carer.
- 10.24. If the concerns are about the foster carer's treatment of the child, or if abuse is suspected, these are recorded in the child's file and reported to the child's social care worker according to the setting's safeguarding children procedure.

11. Children in Specific Circumstances

- 11.1. Always Growing will follow the government guidance contained in the documents below when dealing with children in specific circumstances.

- 11.2. Where no guidance exists, the Safeguarding team will use their professional judgement to take reasonable action. We recognise that the scope of this documentation is very wide ranging and is not always directly applicable to the age of children who attend Always Growing. However, we consider it important to recognise the impact on the child of other family members behaving in an abusive way, and the need to protect all children from harm.
- 11.3. **Bullying Including Cyberbullying: Preventing bullying (DfE, 2012)** our approach to bullying is outline in our Acceptable Behaviour Policy.
- 11.4. **Drugs: Drugs: advice for schools (DfE, 2012)** with the nature of the children who attend Always Growing it is unlikely they will be using drugs. However, staff will be vigilant to drug use of children which would be considered as an indicator of safeguarding concerns. Staff will aware of the effect of parental drug abuse and how that might give rise to a safeguarding concern. Staff will be vigilant of parent/ carer behaviour at drop off and pick up and report any concerns to the Designated Safeguarding Lead.
- 11.5. **Fabricated or Induced Illness: Safeguarding children in whom illness is fabricated or induced (Department of Health, 2008).** We recognise that fabricated or induced illness is physical abuse and it will be dealt with according to our safeguarding policy.
- 11.6. **Faith Abuse: Child abuse linked to faith or belief: national action plan (DfE, 2012)** In line with the Equality Act (2010) we don't discriminate based on faith and encourage and promote diversity. We are aware of our duties to prevent honour-based, faith- or belief-based abuse. We recognise that these specific issues sit separately to radicalisation.
- 11.7. **Forced Marriage: Forced marriage (FCO, 2014)** We acknowledge that forced marriage is an abuse of human rights and we also acknowledge that children should be protected against all forms of sexual exploitation including unlawful activity. We will have an awareness of children who are risk of forced marriage or act if they report their siblings or other family members to be at risk. We are aware that it is illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not used.
- 11.8. **Gangs and Youth Violence: Addressing youth violence and gangs (Home Office)** The nature of the children attending the Academy means they are unlikely to be directly involved with gangs. However, staff will be mindful that children may report other family members as being part of gangs and we will act accordingly in lines with guidance in order to reduce the risk of significant harm.

- 11.9. Gender-Based Violence/violence against women and girls (VAWG): Ending violence against women and girls in the UK against women and girls in the UK (Home Office, 2014).** Always Growing doesn't tolerate violence against any individual. However, we recognised that women and girls are at particular risk and we will take reasonable actions as laid out in our policies to protect them from harm, and actively promote equality and inclusion.
- 11.10. Mental Health: The mental health strategy for England (Department for Health, 2011) Mental Health and behaviour in schools (DfE, 2014).** Mental health can affect children directly and also the mental health of parents and carers can affect the well-being of a child.
- 11.11. Modern Slavery: Modern Slavery Act 2015 (Home Office, 2015)** We recognise that modern slavery expands exploitation to organised networks and gangs creating overlapping harms. The trafficking, coercion and multiple forms of exploitation may occur together, overlapping rather than in isolation.
- 11.12. Private Fostering: Children Act 1989: private fostering (DfE, 2005)** We recognise that children in these circumstances may need additional support to help them cope with their situation. We will support families in this situation and help children understand that modern families can be made up of different combinations of people, family members and none-relatives
- 11.13. Radicalisation: Channel guidance (Home Office, 2012)** further guidance contained in this policy
- 11.14. Sharing of nude or semi-nude photos: CEOP – National Crime Agency.** To reduce the risk of sharing of nude or semi-nude photos, children are not allowed the use of their phones whilst at Always Growing. However, we encourage children to share any concerns they have about things they have seen online with us. Staff are aware of the effect of the wider context of these issues
- 11.15. Teenage Relationship Abuse: 'This is abuse' campaign (Home Office, 2013)** At Always Growing we promote diversity and healthy relationships. Staff are aware of indicators of sexual exploitation which are relevant in this context.
- 11.16. Trafficking: Safeguarding children who may have been trafficked (DfE, 2011)** Where we are concerned a child may have been or will be trafficked we will refer to guidance in this document for further advice.
- 11.17. Child Sexual Exploitation (CSE): What to do if you suspect a child is being sexually exploited (DfE, 2012).** Specific reference is made to CSE. This can take



place in many different forms, but the significant difference in CSE is the imbalance of power, with the perpetrator holding power over the victim. Staff will be aware of the signs of CSE, whilst bearing in mind that the child may not show any external signs of abuse

11.18. **Female Genital Mutilation (FGM): Female genital mutilation: guidelines to protect children and women (DfE, 2014).** Specific reference is made to FGM. Staff are aware potential indicators of abuse and are aware of how to identify situations that may occur in the wider family and the appropriate actions to take

11.19. **Domestic Abuse: Domestic abuse act (Home Office, 2021).** Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. Domestic violence may mean that a child is placed at risk of significant harm.

Additional Safeguarding Policies

12. A Safer Culture - Safer Recruitment Policy

12.1. We pay full regard to Safer Recruitment, selection and pre-employment vetting as laid out in the statutory guidance.

12.2. Always Growing has a separate recruitment policy, which should also be referred to

12.3. Always Growing is compliant with the Disqualification under the Childcare Act 2006

12.4. The criteria for disqualification is as below:

12.4.1. Inclusion on the DBS Children's Barred List

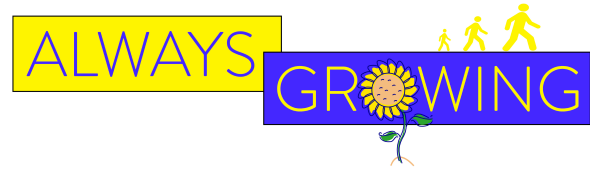
12.4.2. Being found to have committed certain violent and sexual criminal offences against children or adults (Schedule 2 and 3 offences)

12.4.3. Being found to have committed a Schedule 1 offence

12.4.4. Refusal or cancellation of registration relating to childcare, children homes or being prohibited from private fostering

12.4.5. Living in the same household where another person who is disqualified lives or is employed. This is disqualification by association.

12.4.6. Committing an offence overseas which would constitute a disqualification offence in the UK



12.4.7. Been subject to any orders or other determinations related to childcare, such as having children who are subsequently taken into care. These are orders that are made in relation to the care of children

12.5. Staff employed by Always Growing would be in a role that is covered by the Rehabilitation of Offenders Act 1974 (exemptions) and will therefore be required to declare all criminal convictions and cautions, including those that are spent. Staff are not required to declare protected cautions or convictions.

12.6. If a family member, or someone who lives at this address has a relevant offence, this would mean that the member of staff would be disqualified by association. This does not include protected cautions or convictions.

12.7. During the recruitment process safer recruitment interviews allows Always Growing to take reasonable steps to investigate this requirement. Always Growing is aware that staff may be eligible to apply for a waiver from OFSTED, which would allow them to continue to work at Always Growing. This information must be presented to the Directors when this is the case.

12.8. Staff will be required to disclose to the Directors if either themselves or a family member is arrested, charged or convicted with any offence. Staff are made aware that this would not necessarily mean that an individual cannot continue working for Always Growing, however, failure to provide information may result in disciplinary procedures, including liaison with the local authority, OFSTED and police if required.

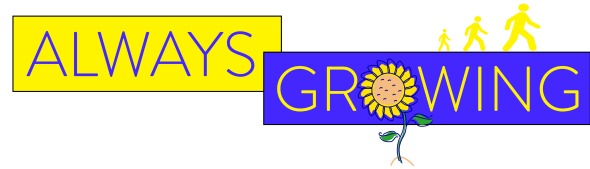
12.9. The Directors may need to refer cases to the LADO, OFSTED, relevant local authority employees and/or the police. Whilst this is happening, it may be necessary to suspend staff whilst investigations are carried out.

13. Whistle Blowing Policy

Introduction

13.1. All staff have a statutory duty in relation to safeguarding, this includes whistle blowing, which is about raising a concern about malpractice within an organisation in confidence and without fear.

13.2. Always Growing is an organisation committed to delivering high quality care and education, promoting organisational accountability and maintaining public confidence.



13.3. The policy is underpinned by the Public Interest Disclosure Act 1998, which encourages people to raise concerns about misconduct or malpractice in the workplace, in order to promote good governance and accountability in the public interest.

13.4. The Act covers behaviour, which amounts to:

- 13.4.1. A criminal offence including abuse or suspected abuse of a child
- 13.4.2. Failure to comply with any legal obligation
- 13.4.3. A miscarriage of justice
- 13.4.4. Danger to health and safety of an individual and/or environment
- 13.4.5. Deliberate concealment of information about any of the above.

13.5. This policy is designed to nurture a culture of openness and transparency within the organisation, which makes it safe and acceptable for employees and volunteers to raise, in good faith, a concern they may have about misconduct or malpractice.

Procedure

13.6. An employee or volunteer who, acting in good faith, wishes to raise such a concern should report the matter to the Directors, who will advise the employee or volunteer of the action that will be taken in response to the concerns expressed.

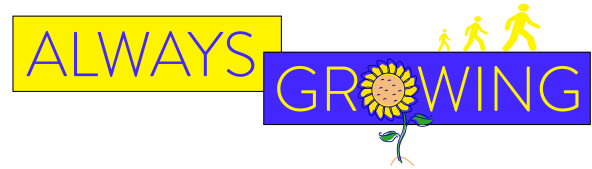
13.7. Concerns should be shared with the Local Authority and Ofsted as soon as possible. A disclosure in good faith to the Directors will be protected. If an employee or volunteer feels the matter cannot be discussed with the Directors, he or she should contact the Local Authority, LADO, for advice on what steps to follow.

13.8. Confidentiality will be maintained wherever possible and the employee or volunteer will not suffer any personal detriment as a result of raising any genuine concern about misconduct or malpractice within the organisation.

13.9. Should a complaint, disclosure or allegation be made about a member of staff, the Directors should attend to manage the situation, if possible. If this is not possible, the most senior member of staff should follow the action plan as outlined above.

14. Physical Intervention Policy

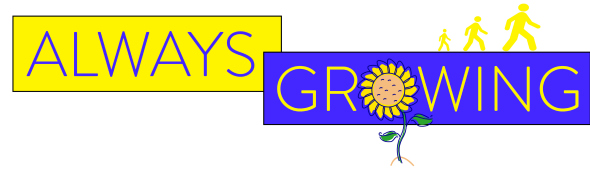
14.1. Always Growing recognises that staff only need to intervene physically as a last resort. The Directors do not expect staff to put themselves at physical risk.



- 14.2. Due to the nature of children attending our nursery, a degree of physical intervention will be necessary as part of their developmental age and stage. This policy is more for when older children may require physical intervention
- 14.3. Physical intervention will be used when an individual poses an immediate risk to themselves, others or Always Growing property and only after having exhausted all other behaviour management procedures as outlined in the behaviour management policy. If possible, staff should seek support from more senior staff before using physical intervention.
- 14.4. Staff may intervene using reasonable force. At all times physical intervention must use the minimum amount of force for the minimum amount of time necessary to prevent injury or damage to property. This force needs to be in proportion to the severity of the situation.
- 14.5. Physical intervention that causes injury or distress to a child may be considered under safeguarding or disciplinary procedures. Therefore staff must ensure that force is in proportion to the severity of the situation.
- 14.6. Physical intervention may be required when carrying out a search for articles which may be reasonably suspected to cause harm to the individual or others. When carrying out a search, the statutory advice will be adhered to.
- 14.7. Only the Directors can authorise a search without consent of the child
- 14.8. Physical intervention should not be used as part of behaviour management or as a form of punishment. Children should not be barred physically from leaving a room or situation, unless this would constitute a very serious threat to themselves or others

15. Intimate Care Policy

- 15.1. We do not exclude children from our nursery setting who are not yet toilet trained and support families and parents with the process at the relevant time
- 15.2. We provide nappy changing facilities, and use good hygiene practices. We view toilet training as a self-care skills that children have the opportunity to learn with the support and non-judgement of adults



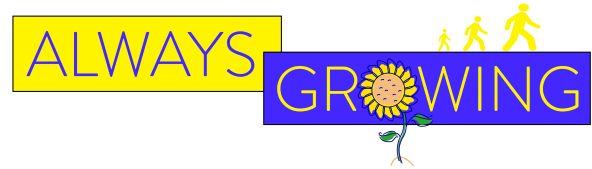
- 15.3. Due to the younger age of children attending, they will require a greater level of adult support when toileting as they may not yet be able to toilet independently. Staff should let another member of the team know when entering the toilet area and remain in earshot of other staff who they can call on for support when needed
- 15.4. Staff are aware of the children in their care who are in nappies or 'pull-ups'. We have changing stations which children can access when they need to be changed. We collect each child's bag before changing so their nappies pull-ups and changing wipes are to hand
- 15.5. When completing nappy changes for all children, staff will generally work in pairs and complete the task together, promoting a culture of openness and safety.
- 15.6. Our staff wear gloves to change the children and before changing starts the areas are prepared. New gloves are used for each child
- 15.7. We are gentle and positive when changing children. We ensure that it is a relaxed time and an opportunity to promote independence in young children
- 15.8. We encourage children to take an interest in using the toilet. We encourage children to wash their hands
- 15.9. We dispose of nappies and pull ups hygienically and in line with statutory guidance. We have clinical waste bags on site and all nappies, used wipes and gloves are disposed of in these specific bags, sometimes referred to as tiger bags.
- 15.10. When children are ready for toilet training, we encourage a collaboration between nursery and home.
- 15.11. We invite a discussion with parents and carers to agree a shared approach and plan for the transition to toileting.
- 15.12. Where there is additional support required, or there are some difficulties with the toileting journey, a more detailed plan may be developed in partnership with parents and carers or other professionals if this is appropriate.
- 15.13. Children using the toilet themselves will be closely supervised at all times to prioritise their safety and well being.
- 15.14. Staff must:
- 15.14.1. Remain nearby and vigilant when children are in the toilet

- 15.14.2.Position themselves appropriately near the toilet so supervision is appropriate
- 15.14.3.Provide the support necessary to the child's age and state of development
- 15.14.4.Inform another member of staff if they need to support children with more involved intimate care
- 15.14.5.Never leave children unsupervised in the toileting areas
- 15.14.6.Report any unusual marks, injuries, comments or behaviours observed in toileting routines with in the safeguarding procedures
- 15.14.7.Keep the toilet and changing areas clean and hygienic

16. Uncollected Child Policy

Introduction

- 16.1.In the event that a child is not collected by an authorised adult at the end of a session/day, Always Growing puts into practice agreed procedures. These ensure the child is cared for safely. The child will receive a high standard of care in order to cause as little distress as possible. We inform parents/carers of our procedures so that, if they are unavoidably delayed, they will be reassured that their children will be properly cared for.
- 16.2.Parents of children starting at the setting are asked to provide the following specific information, which is recorded on our Registration Form:
 - 16.2.1.Home address and telephone number - if the parents do not have a telephone, an alternative number must be given, perhaps a neighbour or close relative.
 - 16.2.2.Mobile telephone number (if applicable).
 - 16.2.3.Names, addresses and telephone numbers of adults who are authorised by the parents to collect their child from the setting, for example a child-minder or grandparent.
 - 16.2.4.Who has parental responsibility for the child
- 16.3.On occasions when parents are aware that they will not be at home or in their usual place of work, they inform us in writing of how they can be contacted
- 16.4.On occasions when parents, or the persons normally authorised to collect the child, are not able to collect the child, they provide us with written details of the name and telephone number of the person who will be collecting their child. We agree with parents how to verify the identity of the person who is to collect their child, this will normal be through the use of a password as well as the collector bringing a form of ID.



16.5. Parents are informed that if they are not able to collect the child as planned, they must inform us as soon as possible so that decisions can be made about how best to deal with the situation.

16.6. We provide parents with the onsite contact telephone number.

Procedure

16.7. If a child is not collected at the end of the session/day, we follow the procedures below:

16.7.1. The child's file is checked for any information about changes to the normal collection routines.

16.7.2. If no information is available, parents/carers are contacted at home or at work.

16.7.3. If this is unsuccessful, the adults who are authorised by the parents to collect their child from the setting - and whose telephone numbers are recorded on the Registration Form - are contacted.

16.7.4. All reasonable attempts are made to contact the parents or nominated carers.

16.7.5. The child does not leave the premises with anyone other than those named on the Registration Form or in their file or previously agreed with the parents and manager.

16.8. If no-one collects the child after the setting has closed and there is no-one who can be contacted to collect the child, we apply the procedures for uncollected children.

16.8.1. We contact our local authority children's social care referral and assessment team: 01628 683150 or Out of hours emergency duty team: 01344 786543

16.8.2. The child stays at the setting in the care of Always Growing until the child is safely collected either by the parents or by a social care worker.

16.8.3. Social care will aim to find the parent or relative. If they are unable to do so, the child will become looked after by the local authority.

16.8.4. Under no circumstances will staff go to look for the parent, nor do they take the child home with them. A full written report of the incident is recorded in the child's file.

16.8.5. Depending on circumstances, we reserve the right to charge parents for the additional hours worked by our staff.

17. Missing Child Policy

Introduction

17.1. At Always Growing children's safety is our highest priority, both on and off the premises. Every attempt is made, through carrying out the outings procedure and the exit/entrance procedure, to ensure the security of children is maintained at all times. In the unlikely event of a child going missing, our missing child procedure is followed.

Response

17.2. As soon as it is noticed that a child is missing on the premises, the staff members alerts the manager

17.3. The manager talks to the staff to find out when and where the child was last seen.

17.4. The manager will carry out a thorough search of the building and garden with the support of as many staff as possible whilst ensuring the safety of all children is maintained.

17.5. The register is checked to make sure that the child has not been collected or no other child is missing.

17.6. Doors and gates are checked to see if there has been a breach of security whereby a child could wander out.

17.7. If at this point the child is not found, the remaining children will be gathered in a way that doesn't cause distress, enabling a full head count to be carried out and a sweep of the setting site by several members of staff.

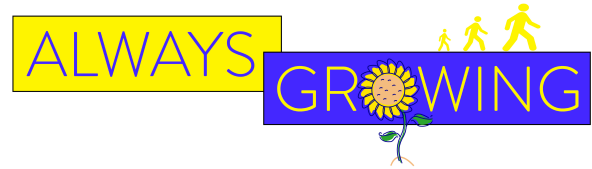
17.8. If the child is still missing, the manager calls the police and reports the child as missing and then calls the parent.

17.9. A missing child could constitute a critical incident and will be recorded with actions taken in line with this policy.

17.10. Staff will inform Directors as soon as possible after following the above procedure

17.11. Staff keep calm and do not let the other children become anxious or worried.

17.12. The manager speaks with the parent(s).



17.13. The manager carries out a full investigation taking written statements from all the staff in the room

17.14. The staff member writes an incident report detailing:

17.14.1. The date and time of the report.

17.14.2. What staff/children were in the group/outing and the name of the staff designated responsible for the missing child.

17.14.3. When the child was last seen in the group/outing.

17.14.4. What has taken place in the group or outing since the child went missing.

17.14.5. The time it is estimated that the child went missing.

17.15. A conclusion is drawn as to how the breach of security happened

17.16. If the incident warrants a police investigation, all staff co-operate fully. In this case, the police will handle all aspects of the investigation, including interviewing staff. Children's social care may be involved if it seems likely that there is a Safeguarding issue to address.

17.17. The incident is reported under RIDDOR arrangements (see the Reporting of Accidents and Incidents policy); the local authority Health and Safety Officer may want to investigate and will decide if there is a case for prosecution.

17.18. In the event of disciplinary action needing to be taken, Ofsted is informed.

17.19. The insurance provider may need to be informed.

Managing people

17.20. Missing child incidents are very worrying for all concerned. Part of managing the incident is to try to keep everyone as calm as possible.

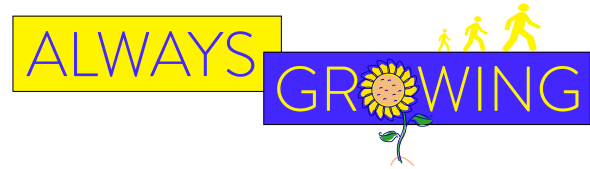
17.21. The staff will feel worried about the child, especially the key person or the designated carer responsible for the safety of that child for the outing. They may blame themselves and their feelings of anxiety and distress will rise as the length of time the child is missing increases.

17.22. Staff may be the understandable target of parental anger and they may be afraid. The manager needs to ensure that staff under investigation are not only fairly treated but receive support while feeling vulnerable.

- 17.23.If possible, Directors will be on hand to help manage this situation.
- 17.24.The parents may feel angry and fraught. They may want to blame staff and may single out one staff member over others; they may direct their anger at the manager. When dealing with a distraught and angry parent, there should always be two members of staff, one of whom is the manager and the other should be a senior member of staff. No matter how understandable the parent's anger may be, aggression or threats against staff are not tolerated, and the police should be called. The Aggressive Parent policy should be followed.
- 17.25.The other children are also sensitive to what is going on around them. They too may be worried. The remaining staff caring for them need to be focused on their needs and must not discuss the incident in front of them. They should answer children's questions as honestly as possible but in a sensitive and reassuring way.
- 17.26.In accordance with the severity of the final outcome, staff may need counselling and support. If a child is not found, injured, or dead, this will be a very difficult time. The Directors will use their discretion to decide what action to take.
- 17.27.Staff must not discuss any missing child incident with the press under any circumstances. The Media and Critical Incidents Policies should be followed.

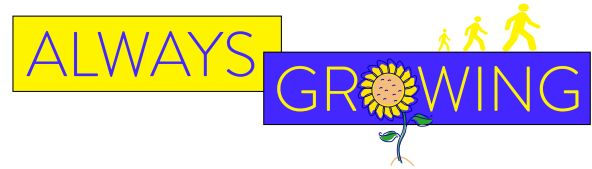
18. Use of Technology and Online Safety

- 18.1.At Always Growing we take steps to ensure that there are effective procedures in place to protect children, young people, and vulnerable adults from the unacceptable use of mobile phones and cameras in the setting.
- 18.2.Online safety risks can be categorised into four areas:
- 18.2.1.Content: exposure to illegal, inappropriate or harmful content which includes radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories
 - 18.2.2.Contact: subjected to harmful online interactions such as adults posing as children with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
 - 18.2.3.Conduct: online behaviour that increases the likelihood of or causes harm
 - 18.2.4.Commerce: risks such as online gambling, inappropriate advertising, phishing or financial scams
- 18.3.Always Growing recognises that online risks can apply to both children and staff.



Personal Mobile Phones

- 18.4. Personal mobile phones belonging to members of staff are stored securely and not used on the premises during working hours.
- 18.5. At the beginning of each individual's shift, personal mobile phones must be stored in a locked cabinet/box/drawer. Staff must sign their phone in and out each day.
- 18.6. Staff can sign their phone out for lunch breaks, however phones must only be used in the designated staff areas.
- 18.7. Failure of staff to follow this procedure will result in disciplinary action and must be reported to the Directors.
- 18.8. The only staff members who are authorised to carry an Always Growing owned mobile phone whilst at Always Growing are the Directors and the provision leaders
- 18.9. Staff should not establish social contact with children or their families, or give out personal details to children or their families, unless this has been agreed by the Directors.
- 18.10. Phone calls relating to Always Growing Business should only be made on an Always Growing phone, one of the Director's phones (which are owned by Always Growing) or by other authorised personnel, (those who have been authorised by the Directors).
- 18.11. Staff should be aware of the potential safeguarding risks of using their mobile phone and social media. Staff should be aware of Always Growing's Media and Confidentiality policies.
- 18.12. Members of staff should ensure that the telephone number of the setting is known to immediate family and other people who need to contact them in an emergency.
- 18.13. Staff should only use Always Growing mobile phones to communicate whilst on Always Growing business.
- 18.14. When going off site on Always Growing business, for example to collect a child from school, staff must take a mobile phone with them, so that they can contact Always Growing or be contacted in an emergency situation.
- 18.15. Staff must ensure that they use their phone only for Always Growing business and in line with the safeguarding training that they have received



18.16. Members of staff will not use their personal mobile phones for taking photographs of children; Always Growing owned phones will be used for this purpose

18.17. Parents and visitors are requested not to use their mobile phones whilst on the premises. Staff must be vigilant in monitoring mobile phone use by others, and challenge unauthorised phone use.

Cameras and videos

18.18. Members of staff must not bring their own cameras or video recorders into the setting.

18.19. Photographs and recordings of children are only taken for valid reasons, i.e. to record their learning and development, or for displays within the setting. Photographs or recordings of children are only taken on equipment belonging to Always Growing.

18.20. Camera and video use is monitored by the Directors.

18.21. Where parents request permission to photograph or record their own children at special events, permission will first be gained from all parents for their children to be included.

18.22. Photographs and recordings of children are only taken and used for promotion if there is permission to do so. This permission is obtained in the registration process, and parents may withdraw their permission at any time

18.23. All photographs taken are stored on the company password protected laptop or password protected phone. No photographs taken can be stored on a USB or other memory device, unless it is encrypted and authorised by the Directors

18.24. All photographs must be downloaded onto the company password protected laptop and deleted from the camera.

18.25. All staff taking photographs must ensure that they protect themselves by ensuring another staff member is present.

18.26. Cameras and other photographic media (such as mobile phones) must not be taken into the bathroom or changing areas.

Use of ICT

- 18.27. At Always Growing we take steps to ensure that there are effective procedures in place to protect children, young people, and vulnerable adults from the unacceptable use of ICT in the setting. The policy defines and describes the acceptable use of ICT (Information and Communications Technology) for our employees.
- 18.28. Its purpose is to minimise the risk to the children of inappropriate contact from staff, to protect employees and Always Growing from litigation and to minimise the risk to ICT systems. This policy deals with the use of ICT facilities in early years settings applies to all setting-based employees and other authorised users.
- 18.29. All staff must act in a lawful manner, making appropriate use of site technologies for approved purposes only.
- 18.30. User Responsibilities: Staff found to be in breach of this policy may be disciplined in accordance with the disciplinary procedure. In certain circumstances, breach of this policy may be considered gross misconduct resulting in termination of employment. Users must report all suspected breaches of this policy to the most senior member of staff on site.
- 18.31. All users are expected to act in a responsible, ethical and lawful manner with the understanding that site electronic and manual information may be accessible to the public under the Freedom of Information Act 2000. Users should uphold privacy and confidentiality in accordance with the Data Protection Act 2018 and the GDPR regulations.
- 18.32. Users must not load or download software on any device without the authorisation of the Directors. Periodic audits of software held on ICT equipment will be undertaken.
- 18.33. Users must take care to store sensitive information, e.g. child data safely and to keep it password protected, on all systems, including Office computers. Personal information must only be stored on encrypted systems.
- 18.34. Inappropriate or illegal content should not be created or accessed on ICT equipment at any time.
- 18.35. In the course of normal operations, ICT resources are to be used for business purposes only.
- 18.36. At all times, staff must take every step to do all they reasonably can to limit children's exposure

Artificial Intelligence (AI)

18.37. Generative artificial intelligence (AI) tools are widespread and easy to access.

Always Growing recognises that there are many potential positive applications for AI, however, there are opportunities for AI to facilitate abuse or exposure to harmful content.

18.38. Staff should be aware of the risk of utilising AI tools whilst they are in development, and must carry out appropriate risk assessments for any AI technologies being used at Always Growing. This will also include verification of information produced for accuracy and appropriateness of information.

Appendices

Appendix 1: Definitions and Indicators of Abuse

1. Neglect

1.1 Neglect 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.

1.2 Neglect may occur during pregnancy 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)
- Ensure access to appropriate medical care or treatment

1.3 It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

1.4 The following may be indicators of neglect (this is not designed to be used as a checklist):

- Constant hunger
- Stealing, scavenging and/or hoarding food;
- Frequent tiredness or listlessness
- Frequently dirty or unkempt,
- Often poorly or inappropriately clad for the weather
- Poor school attendance or often late for school
- Poor concentration
- Affection or attention seeking behaviour
- Illnesses or injuries that are left untreated
- Failure to achieve developmental milestones, for example growth, weight
- Failure to develop intellectually or socially
- Responsibility for activity that is not age appropriate such as cooking, ironing, caring for siblings;
- The child is regularly not collected or received from the Academy
- The child is left at home alone or with inappropriate carers

2. Physical Abuse

2.1 Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child.

2.2 Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

2.3 The following may be indicators of physical abuse (this is not designed to be used as a checklist):

- Multiple bruises in clusters, or of uniform shape
- Bruises that carry an imprint, for example of a hand, a cord or an implement.
- Bite marks
- Round burn marks
- Multiple burn marks and burns on unusual areas of the body such as the back, shoulders or buttocks.
- An injury that is not consistent with the account given.
- Changing or different accounts of how an injury occurred.
- Bald patches.
- Symptoms of drug or alcohol intoxication or poisoning.
- Unaccountable covering of limbs, even in hot weather.
- Fear of going home or parents being contacted.
- Fear of medical help.
- Fear of changing for PE.
- Inexplicable fear of adults or over-compliance.
- Violence or aggression towards others including bullying.
- Isolation from peers.

3. Sexual Abuse

3.1 Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening.

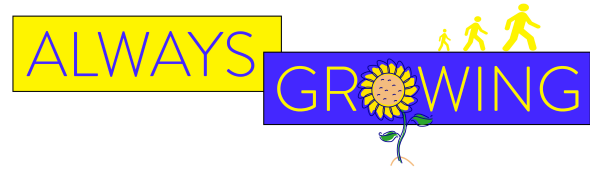
3.2 The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non- penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing.

3.3 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).

3.4 Sexual abuse is not solely perpetrated by adult males. Women can also commit act of sexual abuse as can other children

3.5 The following may be indicators of sexual abuse (this is not designed to be used as a checklist):

- Sexually explicit play or behaviour or age-inappropriate knowledge
- Anal or vaginal discharge, soreness or scratching
- Reluctance to go home
- Inability to concentrate, tiredness
- Refusal to communicate.
- Thrush, persistent complaints of stomach disorders or pains
- Eating disorders, for example anorexia nervosa and bulimia
- Attention seeking behaviour, self mutilation, substance abuse
- Aggressive behaviour including sexual harassment or molestation



- Unusually compliant
- Regressive behaviour, enuresis, soiling
- Frequent or open masturbation, touching others inappropriately
- Depression, withdrawal, isolation from peer group
- Reluctance to undress for PE or swimming
- Bruises, scratches in genital area

4. Emotional Abuse

4.1 Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development.

4.2 It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person.

4.3 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.

4.4 It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child in participating in normal social interaction.

4.5 It may also involve seeing or hearing the ill- treatment of another. It may involve serious bullying (including cyber bullying), 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.

4.6 The following may be indicators of emotional abuse (this is not designed to be used as a checklist):

- The child consistently describes him/herself in very negative ways – as stupid, naughty, hopeless, ugly.
- Over-reaction to mistakes
- Delayed physical, mental, emotional development
- Sudden speech or sensory disorders
- Inappropriate emotional responses, fantasies
- Neurotic behaviour: rocking, banging head, regression, tics and twitches
- Self-harming, drug or solvent abuse
- Fear of parents being contacted
- Running away
- Compulsive stealing
- Appetite disorders - anorexia nervosa, bulimia
- Soiling, smearing faeces, enuresis

N.B.: Some situations where children stop communication suddenly (known as "traumatic mutism") can indicate maltreatment.

5. Responses from Parents

5.1 Research and experience indicates that the following responses from parents may suggest a cause for concern across all four categories:

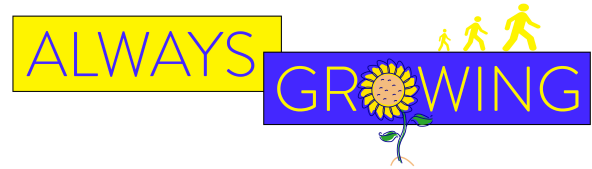
- Delay in seeking treatment that is obviously needed
- Unawareness or denial of any injury, pain or loss of function (for example, a fractured limb)
- Incompatible explanations offered, several different explanations or the child is said to have acted in a way that is inappropriate to her/his age and development
- Reluctance to give information or failure to mention other known relevant injuries
- Frequent presentation of minor injuries
- A persistently negative attitude towards the child
- Unrealistic expectations or constant complaints about the child
- Alcohol misuse or other drug/substance misuse
- Parents request removal of the child from home
- Violence between adults in the household

6. Child Sexual Exploitation

6.1 The following list of indicators is not exhaustive or definitive but it does highlight common signs which can assist professionals in identifying children or young people who may be victims of sexual exploitation.

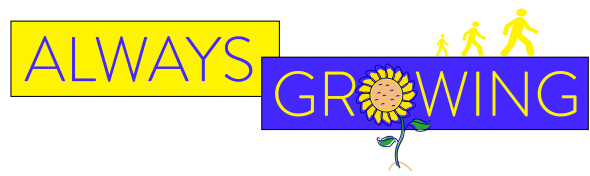
Signs include:

- underage sexual activity
- inappropriate sexual or sexualised behaviour
- sexually risky behaviour, 'swapping' sex
- repeat sexually transmitted infections
- in girls, repeat pregnancy, abortions, miscarriage
- receiving unexplained gifts or gifts from unknown sources
- having multiple mobile phones and worrying about losing contact via mobile
- having unaffordable new things (clothes, mobile) or expensive habits alcohol, drugs)
- changes in the way they dress
- going to hotels or other unusual locations to meet friends
- seen at known places of concern
- moving around the country, appearing in new towns or cities, not knowing where they are
- getting in/out of different cars driven by unknown adults
- having older boyfriends or girlfriends
- contact with known perpetrators
- involved in abusive relationships, intimidated and fearful of certain people or situations
- hanging out with groups of older people, or anti-social groups, or with other vulnerable children



- associating with other young people involved in sexual exploitation
- recruiting other young people to exploitative situations
- truancy, exclusion, disengagement with school, opting out of education altogether
- unexplained changes in behaviour or personality (chaotic, aggressive, sexual)
- mood swings, volatile behaviour, emotional distress
- self-harming, suicidal thoughts, suicide attempts, overdosing, eating disorders
- drug or alcohol misuse
- getting involved in crime
- police involvement, police records
- involved in gangs, gang fights, gang membership
- injuries from physical assault, physical restraint, sexual assault.

Modern slavery concerns can include networks/groups, trafficking, coercion and the possibility of multiple forms of exploitation occurring together. These concerns often overlap, rather than occurring in isolation.



Appendix 2 Logging a Concern:

Child's Name:

Date of Birth:

Date:

Time (of writing this record):

Name: TO BE COMPLETED BY THE PERSON RAISING THE CONCERN

Print

Signature

Job Title:

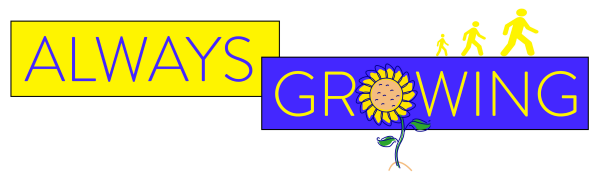
Note the reason(s) for recording the incident.

Record the following factually: Who? What (If recording a verbal disclosure by a child use their words)? Where? When (date & time of incident)? Any witnesses?

Professional opinion where relevant (how and why might this have happened?)

Note actions, including names of anyone to whom your information was passed.

Any other relevant information (Factual)



PART 2: (for use by Designated Safeguarding Lead)

Time & date information received by Designated Safeguarding Lead, and from whom

Any advice sought by DP (date, time, name, role, organisation & advice given)

Action taken (referral to children's services/ monitoring advice given to appropriate staff/ CAF etc) If decision not to refer, justify reason.

Note time, date, names, who information shared with and when etc.

Parent's informed

Yes/ no

and reasons

Outcome

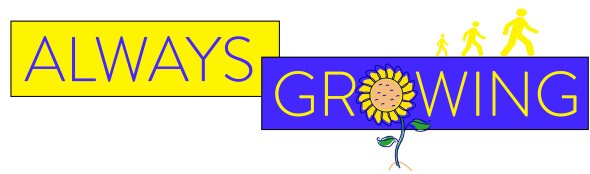
Record names of individuals/agencies who have given you information regarding outcome of any referral (if made)

Where can additional information regarding child/ incident be found? (e.g. pupil file, serious incident book)

Signed

Printed Name

Date



Appendix 3: safer recruitment and DBS checks – policy and procedures

We will record all information on the checks carried out in the Always Growing's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

Recruitment and Selection Process

We will put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children

Advertising:

We will make clear:

- Our commitment to safeguarding and promoting the welfare of children
- That safeguarding checks will be undertaken
- Safeguarding requirements and responsibilities of the role and the amount of contact the role will have with children
- Whether the role is exempt from the Rehabilitation of Offenders Act 1974

Application Form:

Our forms will:

- Include a statement saying it is an offence to apply for a role if an applicant is barred from engaging in regulated activity relevant to children
- Include a link to our safeguarding and child protection policy

Shortlisting:

Our shortlisting process will involve at least 2 people and will:

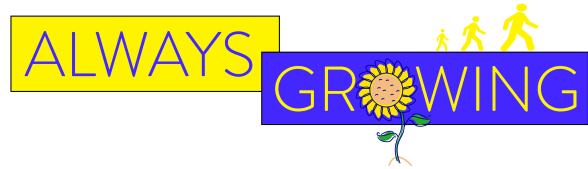
- Consider any inconsistencies and look for gaps in employment and reasons given for them
- Explore all potential concerns

Once shortlisted, we will ask candidates to:

- Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they will have the opportunity to include relevant information for discussion.

This includes:

- If they have a criminal history
- Whether they are included on the barred list
- Whether they are prohibited from teaching
- Information about any criminal offences committed in any country



- Any relevant overseas information
- This declaration will be signed to confirm that it is true

We will inform candidates that we will carry out an online search to help identify any incidents or issues that are publicly available online. We will record that this search has taken place, and note anything of significance that is discovered.

Seeking references and checking employment history

We will obtain references before interview. Any concerns raised will be explored further and taken up with the candidate at interview.

When seeking references we will:

- Not accept open references
- Liaise directly with referees and verify any information contained within references as needed
- Ensure references are obtained from candidate's current employer and completed by a senior person who can confirm accurately regarding disciplinary investigations
- Obtain verification for the most recent relevant period of employment if they are not currently employed
- Obtain information from when the candidate last worked with children if they aren't doing so
- Compare information on application form with references and address any inconsistencies
- Resolve concerns before appointment is confirmed

Interview and selection

When interviewing we will:

- Probe any gaps in employment
- Ask candidate to explain if they have changed employment or location frequently
- Explore any potential areas of concern and determine the candidates suitability to work with children
- Record information and decisions made

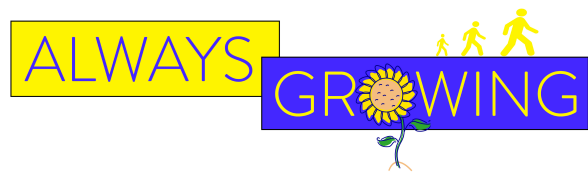
Pre-appointment vetting checks

We will record all information on the checks carried out in the Single Central Record (SCR). When needed, we will hold copies of these checks on individual personnel files

New staff

All offers of appointment will be conditional until completion of pre-employment checks. When appointing new staff, we will:

- Verify their identity
- Obtain (via the applicant) an enhanced Disclosure and Barring Service (DBS) certificate, including barred list information for those who will be engaging in regulated activity (see definition below).



- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK.
- Verify their professional qualifications, as appropriate
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK, including (where relevant) any teacher sanctions or restrictions imposed by a European Economic Area professional regulating authority, and criminal records checks or their equivalent
- We will obtain a DBS certificate before the individual begins working, including when using the DBS update service

We will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

Where we no longer keep a copy of the DBS certificate, we may keep a record of the fact that vetting and barring checks had taken place and what the outcome of this was.

We will ask for written information about previous employment history and check that information is not contradictory or incomplete.

We will seek references on all short-listed candidates, including internal candidates, before interview. We will scrutinise these and resolve any concerns before confirming appointments. The references requested will ask specific questions about the suitability of the applicant to work with children.

Regulated activity means a person who will be:

- Responsible, on a regular basis in an Early Years setting, school or college, for teaching, training, instructing, caring for or supervising children; or
- Working or being in an Early Years setting, school or college where that work provides an opportunity for contact with children; or
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

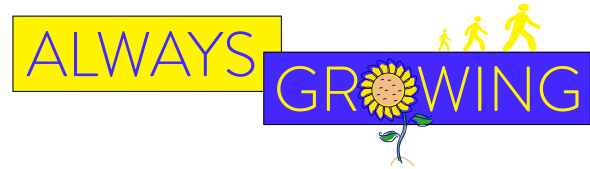
Existing staff

In certain circumstances we will carry out all relevant checks on existing staff as if they are a new member of staff. These circumstances are when:

- There are concerns about an existing member of staff's suitability to work with children
- An individual moves from a post that is not in regulated activity to one that is
- There has been a break in service of 12 weeks or more.

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- We believe the individual has engaged in [relevant conduct](#); or
- The individual has received a caution or conviction for a relevant offence, or there is reason to believe the individual has committed a listed relevant offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#); or



- The 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

Agency and third-party staff

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

Contractors

We will ensure that any contractor, or any employee of the contractor, who is to work at Always Growing has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be:

- An enhanced DBS check with barred list information for contractors engaging in regulated activity
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children

We will obtain the DBS check for self-employed contractors.

We will not keep copies of such checks for longer than 6 months.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

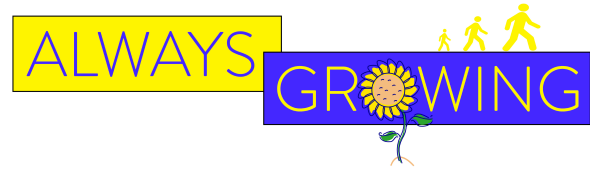
We will check the identity of all contractors and their staff on arrival at the Always Growing.

For self-employed contractors such as music teachers or sports coaches, we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Volunteers

We will:

- Never leave a volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all and any volunteers
- Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.



Appendix 4: allegations of abuse made against staff

Section 1: Allegations that may meet the harms threshold

This section of this policy applies to all cases in which it is alleged that a current member of staff, including a supply member of staff, volunteer or contractor, has:

- Behaved in a way that has harmed a child, or may have harmed a child, or
- Possibly committed a criminal offence against or related to a child, or
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children, or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children. This includes behaviour taking place both inside and outside of Always Growing

If we are in any doubt as to whether a concern meets the harm threshold, we will consult our local authority designated officer (LADO).

We will deal with any allegation of abuse against a member of staff or volunteer very quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

A case manager will lead any investigation. This will be the Directors. Where one of the Directors is subject to the allegation, the case manager will be identified at the earliest opportunity.

Our procedures for dealing with allegations will be applied with common sense and judgement.

Suspension of the accused until the case is resolved

Suspension will not be the default position, and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

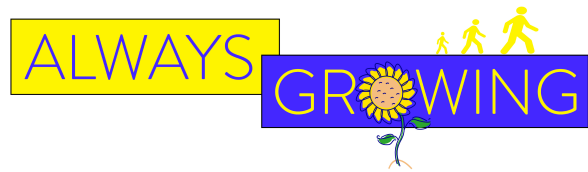
Based on an assessment of risk, we will consider alternatives such as:

- Redeployment 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 the individual to alternative work so that they do not have unsupervised access to children
- Moving the child or children so they will not come into contact with the individual, making it clear that this is not a punishment and parents have been consulted
- Temporarily redeploying the individual to another role in a different location

If in doubt, the case manager will seek views from the stakeholders involved with the decision. This could include, HR or legal advisor, LADO and police and children's social care if this is relevant.

Definitions for outcomes of allegation investigations

Substantiated: there is sufficient evidence to prove the allegation



Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive or to cause harm to the subject of the allegation

False: there is sufficient evidence to disprove the allegation

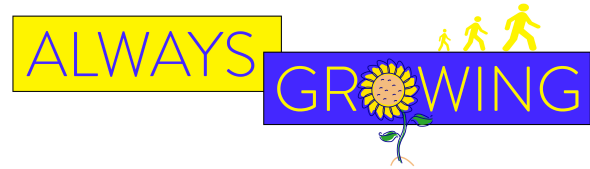
Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)

Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the Directors will take the following steps:

- Conduct basic enquiries to establish the facts and whether there is any foundation to the allegation. This will not be an in-depth investigation at this stage, just to establish the key points of information and will not unduly delay speaking with the LADO
- Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate
- Where there are concerns about the welfare of other children in the community or the individual's family they will discuss these concerns with the DSL. It may be necessary to make a risk assessment of the situation and refer to children's social care
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact and their contact details
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action and/or liaise with the police and/or children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.



- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case. This is only in relation to their child, and no information will be shared regarding the staff member
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

We will inform Ofsted 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), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made.

Where the police are involved, wherever possible the Directors will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the disciplinary process, should this be required at a later point.

Additional considerations for supply staff and all contracted staff

If there are concerns or an allegation is made against someone not directly employed by Always Growing, such as supply staff provided by an agency, we will take the actions below in addition to our standard procedures.

We will not decide to stop using supply staff due to safeguarding concerns without finding out the facts and liaising with our local authority designated officer to determine a suitable outcome

The Directors will discuss with the agency whether it is appropriate to suspend the supply staff, or redeploy them while the investigation takes place

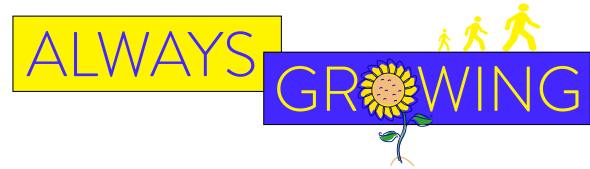
We will involve the agency fully, but we will take the lead in collecting the necessary information and providing it to the local authority designated officer as required

We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

Timescales

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious will be resolved within 1 week



- If the nature of an allegation does not require formal disciplinary action, we will institute appropriate action within 3 working days
- If a disciplinary hearing is required and can be held without further investigation, we will hold this within 15 working days

These times are objectives only, and where they are not met, we will endeavour to take the required action as soon as possible thereafter

Specific actions

Action following a criminal investigation or prosecution

The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services.

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the Always Growing ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the Directors will make a referral to the DBS for consideration of whether inclusion on the barred lists is required. If they think that the individual has engaged in conduct that has harmed (or is likely to harm) a child, or if they think the person otherwise poses a risk of harm to a child, they must make a referral to the DBS.

Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the Directors will consider how best to facilitate this.

The Directors will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the setting.

Unsubstantiated, unfounded, false or malicious reports

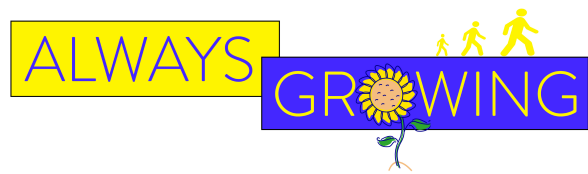
If a report is:

- Determined to be unsubstantiated, unfounded false or malicious, the DSL will consider appropriate next steps. If they consider that the child and/or person who make the allegation is in need of help or they allegation may have been a cry for help, a referral to social care may be appropriate
- Shown to be deliberately invented, or malicious, the Directors will consider whether any disciplinary action is appropriate against the individual(s) who made it.

Unsubstantiated or malicious allegations

If an allegation is:

- Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider next steps. If they consider the child and or person who made the allegation may be a cry for help, a referral to social care could be appropriate



- shown to be deliberately invented, or malicious, the Directors will consider whether any disciplinary action is appropriate against the individual(s) who made it,

Confidentiality

Always Growing will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The Directors will take advice from the local authority's designated officer, police and children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises

Record-keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case.

The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).

For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken, decisions reached and the outcome
- A declaration on whether the information will be referred to in any future reference

In these cases, the Directors will provide a copy to the individual, in agreement with children's social care or the police as appropriate.

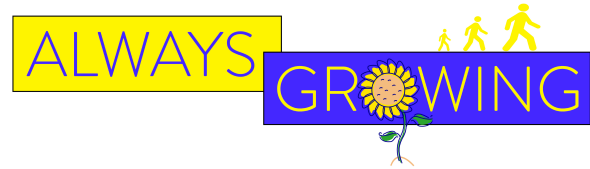
Where records contain information about allegations of sexual abuse, we will preserve these for a reasonable period of time once the child has left Always Growing.

References

When providing employer references, we will:

- not refer to any allegation that has been proven to be false, unsubstantiated or malicious, or any repeated history of allegations where all such allegations have been proven to be false, unsubstantiated or malicious.
- Include substantiated allegations, provided the information is factual and does not include opinions

Learning lessons



After any cases where the allegations are *substantiated*, we will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to our procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension
- Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual

For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

Non-recent allegations

Abuse can be reported, no matter how long ago it happened.

We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations.

Where an adult makes an allegation to the Always Growing that they were abused as a child, we will advise the individual to report the allegation to the police.

Section 2: concerns that do not meet the harm threshold

This section applies to all concerns (including allegations) about members of staff, including supply staff, volunteers and contractors, which do not meet the harm threshold set out in section 1 above.

Concerns may arise through, for example:

- Suspicion
- Complaint
- Disclosure made by a child, parent or other adult within or outside Always Growing
- Pre-employment vetting checks

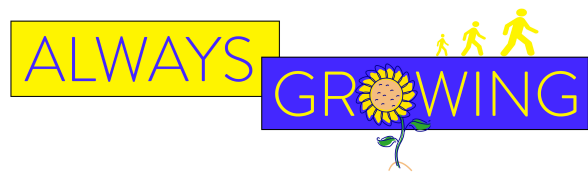
We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

Definition of low-level concerns

The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of Always Growing may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, **and**
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority

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



- Being inappropriately friendly with children
- Having favourites
- Taking photographs of children on their personal mobile phone
- Engaging with a child on a one-to-one basis unnecessarily such as in a secluded area or behind a closed door where other staff haven't been informed or there is a general lack of transparency
- Using inappropriate sexualised, intimidating or offensive language

Sharing low-level concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns in line with this policy
- Empowering staff to self-refer if they feel that they have done something wrong
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in Always Growing's safeguarding system

Responding to low-level concerns

If the concern is raised via a third party, the Directors will collect evidence where necessary by speaking:

- Directly to the person who raised the concern, unless it has been raised anonymously
- To the individual involved and any witnesses

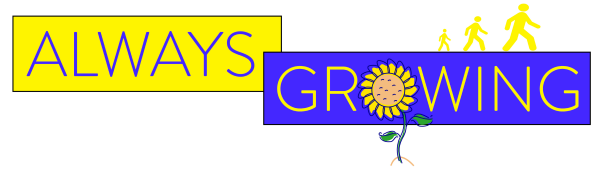
The Directors will use the information collected to categorise the type of behaviour and determine any further action, in line with behaviour policy and code of conduct.

Record keeping

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority
- Retained at least until the individual leaves employment



Where a low-level concern relates to a supply staff or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

References

We will not include low-level concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance