



# Jack & Jill Pre-school

Registered Charity no 1000658

Rear of Mill Lane School  
Via Whites Field, Mill Lane, Chinnor  
Oxfordshire OX39 4RF  
Telephone: 01844 875704



Reviewed September 2022

Next review due September 2023

## Safeguarding Policy

(Including low level concerns and allegations of serious harm or abuse against staff or volunteers.)

### Policy statement

Jack and Jill Pre-School will work with children, parents and the community to ensure the rights and safety of children, and will do this by putting young people and vulnerable adults right to be 'strong, resilient and listened to' at the heart of all our activities. Our Safeguarding Policy is based on the three key commitments shown below.

#### **Key commitment 1**

Jack and Jill Pre-School is committed to building a 'culture of safety' in which children, young people and vulnerable adults are protected from abuse and harm in all areas of its service delivery.

#### **Key commitment 2**

Jack and Jill Pre-School is committed to responding promptly and appropriately to all incidents or concerns of abuse that may occur and to work with statutory agencies in accordance with the procedures that are set down in 'What to do if you're worried a child is being abused' (DfE 2015) and 'Working Together' 2018.

#### **Key commitment 3**

Jack and Jill Pre-School is committed to promoting awareness of child abuse issues throughout its information, training and learning programmes for adults. It is also committed to empowering young children, through its early childhood curriculum, promoting their right to be strong, resilient and listened to.

### Procedures

We carry out the following procedures to ensure we meet the three key commitments of the Jack and Jill Safeguarding Children Policy.

#### **Key commitment 1**

Jack and Jill Pre-School is committed to building a 'culture of safety' in which children, young people and vulnerable adults are protected from abuse and harm in all areas of its service delivery.

#### **Staff and volunteers**

- Our designated people who co-ordinate child protection issues are: **The Supervisor (Carol Allen), (Carla Bird from November 2022).**
- Our designated officer who oversees this work is: The Committee Chairperson. This officer is required to undertake Safeguarding training.
- We ensure all staff are trained to understand our safeguarding policies and procedures and understand that safeguarding is their responsibility (Staff are required to confirm in writing that they have read and understood the policy. This includes the nominated officer on the committee)
- Parents receive a copy of this policy via EYLOG and we have a noticeboard in the entrance area and an area of our website with further information relating to safeguarding.

- All staff have an up-to-date knowledge of safeguarding issues, are alert to the signs and symptoms of abuse, and understand their professional duty to ensure safeguarding concerns are reported to the LCSS (Locality and Community Support Service), MASH (Multi Agency Safeguarding Hub), LADO or the NSPCC.
- All staff understand the principles of \*early help (as defined in *Working Together to Safeguard Children, 2018*) and are able to identify those children and families who may be in need of \*early help and enable them to access it.
- All staff understand the thresholds of significant harm and understand how to access services for families, including for those families who are below the threshold for significant harm, according to arrangements published by the OSCB <https://www.oscb.org.uk/wp-content/uploads/2021/09/Threshold-of-Needs-2021.pdf>
- All staff are confident to ask questions in relation to any safeguarding concerns and know not to just take things at face value but can be respectfully sceptical.
- All staff understand their responsibilities under the General Data Protection Regulation and the Data Protection Act 2018, and understand relevant safeguarding legislation, statutory requirements and local safeguarding partner requirements and ensure that any information they may share about parents and their children with other agencies is shared appropriately and lawfully.
- We will support families to receive appropriate early help by sharing information with other agencies in accordance with statutory requirements and legislation.
- We will share information lawfully with safeguarding partners and other agencies where there are safeguarding concerns.
- We will be transparent about how we lawfully process data.
- All staff understand how to escalate their concerns in the event that they feel either the local authority and/or their own organisation has not acted adequately to safeguard and know how to follow local safeguarding procedures to resolve professional disputes between staff and organisations.
- All staff understand what our preschool expects of them in terms of their required behaviour and conduct, and follow our policies and procedures on positive behaviour, online safety, and whistleblowing.
- Children have a key person to build a relationship with, and are supported to articulate any worries, concerns or complaints that they may have in an age appropriate way.
- All staff understand our policy on promoting positive behaviour and follow it in relation to children showing aggression towards other children.
- We provide adequate and appropriate staffing resources to meet the needs of children.
- Applicants for posts within the setting are clearly informed that the positions are exempt from the Rehabilitation of Offenders Act 1974.
- Enhanced Criminal Records and barred lists checks and other suitability checks are carried out for staff and volunteers prior to their post being confirmed, to ensure that no disqualified person or unsuitable person works at the setting or has access to the children.
- Where applications are rejected based on information disclosed, applicants have the right to know and to challenge incorrect information.
- Enhanced criminal records and barred lists checks are carried out on anyone working on the premises.
- Information is recorded about staff qualifications, and the identity checks and vetting processes that have been completed including:
  - the criminal records disclosure reference number;
  - certificate of good conduct or equivalent where a UK DBS check is not appropriate;
  - the date the disclosure was obtained; and
  - details of who obtained it.

- All staff and volunteers are informed that they are expected to disclose any convictions, cautions, court orders or reprimands and warnings which may affect their suitability to work with children (whether received before or during their employment with us).
- All staff are required to subscribe to the on-line update service regarding their DBS which is checked 6 monthly by our administrator.
- Volunteers, including students and parent helpers without DBS clearance, do not work unsupervised.
- Staff receive regular supervision, which includes discussion of any safeguarding issues, and their performance and learning needs are reviewed regularly.
- In addition to induction and supervision, staff are provided with clear expectations in relation to their behaviour.
- We notify the Disclosure and Barring Service of any person who is dismissed from our employment, or resigns in circumstances that would otherwise have led to dismissal for reasons of a child protection concern.
- We have procedures for recording the details of visitors to the setting.
- We take security steps to ensure that we have control over who comes into the setting so that no unauthorised person has unsupervised access to the children.
- We follow the procedures of our 'Whistle Blowing Policy'.
- We take steps to ensure children are not photographed or filmed on video for any other purpose than to record their development and progress in their EYLOG learning journeys. Parents sign via EYLOG and have access to records holding visual images of their child. We seek permission from parents before using photos for displays, fundraising products, promotional and marketing materials and in local press.
- We inform parents at our special events to which families are invited, (for example the Christmas parties, Easter celebration and the leavers' parties), that the photographs and videos they take MUST be for personal use only, and not to be put on the public domain such as Facebook, You Tube and other public sites on the internet.
- Any personal information is held securely and in line with data protection requirements and guidance from the ICO, (Information Commissioners Office).
- The designated people in the setting have responsibility for ensuring that there is an adequate on-line safety policy in place.
- We keep a written record of all complaints and concerns including details of how they were responded to.
- We ensure that robust risk assessments are completed, that they are seen and signed by all relevant staff and that they are regularly reviewed and updated, in line with our health and safety policy.
- ***The designated officer on the committee will support the designated persons to undertake their role adequately and offer advice, guidance, supervision and support.***
- ***The designated persons will inform the designated officer on the committee, at the first opportunity, of every significant safeguarding concern; however this should not delay any referrals being made to the LCSS service, MASH, the NSPCC, (ESAT) Education Safeguarding Advisory Team and LADO, Ofsted or Riddor.***

### **Key commitment 2**

Jack and Jill Pre-School is committed to responding promptly and appropriately to all incidents or concerns of abuse that may occur and to work with statutory agencies in accordance with the procedures that are set down in 'What to do if you're worried a child is being abused' (DfE 2015) and the Care Act 2014.

### **Attendance**

We have comprehensive non-attendance policy and a system in place to record and monitor all absences, and to act upon un-notified absences. Any absence with no prior explanation will prompt a first day contact. In the event that a child is not brought in to the setting, and we have not been notified of that fact, we will initially message via EYLOG, then telephone the parent/carer if no response received. If we do not receive a response from any of the contact numbers which we hold for the parent or carer, we will take further action. Further action involves contacting the

police/LCSS, to inform them of the situation. If the child has current involvement with social care, the social worker is notified on the day of the unexplained absence.

### ***Responding to suspicions of abuse***

- We acknowledge that abuse of children can take different forms - physical, emotional, and sexual, as well as neglect.
- We ensure that all staff have an understanding of the additional vulnerabilities that arise from special educational needs and/or disabilities, plus inequalities of race, gender, language, religion, sexual orientation or culture, and that these receive full consideration in relation to child, young person or vulnerable adult protection.
- When children are suffering from physical, sexual or emotional abuse, or experiencing neglect, this may be demonstrated through:
  - significant changes in their behaviour;
  - poor oral health;
  - deterioration in their general well-being;
  - their comments which may give cause for concern, or the things they say (direct or indirect disclosure);
  - changes in their appearance, their behaviour, or their play;
  - non-verbal signs, particularly for non-verbal children, or two year olds;
  - signs of self harming;
  - unexplained bruising, marks or signs of possible abuse or neglect;
  - any reason to suspect neglect or abuse outside the setting.
- We understand how to identify children who may be in need of \*early help and how to access services for them
- We understand that we should refer a child who meets the s17 Children Act 1989 child in need definition to local authority children's social work services
- We understand that we should refer any child who may be at risk of significant harm to MASH.
- We consider factors affecting parental capacity and risk, such as social exclusion, domestic violence, radicalisation, drug or alcohol abuse, mental or physical illness or parent's learning disability.
- We are aware that children's vulnerability is potentially increased when they are privately fostered and when we know that a child is being cared for under a private fostering arrangement, we liaise with our LCSS service for advice.
- We are aware of other factors that affect children's vulnerability such as, abuse of children who have special educational needs and/or disabilities; fabricated or induced illness; child abuse linked to beliefs in spirit possession; sexual exploitation of children, including through internet abuse; Female Genital Mutilation (FGM) and radicalisation or extremism that may affect, or may have affected, children and young people using our provision.
- In relation to radicalisation and extremism, we follow the Prevent Duty guidance for England and Wales published by the Home Office and the LCSS's procedures on responding to radicalisation.
- We are aware that significant harm can include witnessing the ill treatment of another person.
- We are aware that children may be subject to on-line abuse, even at the Early Years stage. We have a separate On-line Safety Policy.
- We are aware of the mandatory duty that applies to teachers, and health workers to report cases of FGM to the police. We are also aware that early years practitioners should follow local authority published safeguarding procedures to respond to FGM and other safeguarding issues, which involves contacting police if a crime of FGM has been or may be about to be committed.
- We also make ourselves aware that some children and young people are affected by gang activity, by complex, multiple or organised abuse, through forced marriage or honour based violence or may be victims of child

trafficking. While this may be less likely to affect young children in our care, we may become aware of any of these factors affecting older children and young people who we may come into contact with

- If we become concerned that a child may be a victim of modern slavery or human trafficking we will refer to the National Referral Mechanism, as soon as possible and refer and/or seek advice to the local authority children's social work service and/or police.
- We will be alert to the threats children may face from outside their families, such as that posed by organised crime groups such as county lines and child sexual exploitation, online use and from within peer groups and the wider community.
- Where we believe that a child in our care or that is known to us, (for example a sibling), may be affected by any of these factors we follow the procedures below for reporting child protection concerns.
- **Where such evidence is apparent, the child's key person makes a dated record of the details of the concern on the 'Welfare concerns / action taken' form, and discusses what to do with the member of staff who is acting as the 'designated person'. The information is stored on the child's personal file, and kept in the confidential locked filing cabinet. Further action is taken as necessary, such as contacting our LCSS (Locality and Community Support Service) for guidance, or MASH (Multi Agency Safeguarding Hub) if there is immediate danger, on 0345 050 7666.**
- In the event that a staff member or volunteer is unhappy with the decision made of the designated person in relation to whether to make a safeguarding referral they must follow **escalation** procedures.
- Direct disclosure of abuse by a child must be reported.
- We take care not to influence the outcome either through the way we speak to children or the way we ask questions of children, (such as giving them suggestions of whom the perpetrator might be).
- We take account of the need to protect young people aged 16-19 as defined by the Children Act 1989. This may include students or school children on work placement, young employees or young parents. Where abuse is suspected, we follow the procedure for reporting any other child protection concerns. The views of the young person will always be taken into account, but the setting may override the young person's refusal to consent to share information if it feels that it is necessary to prevent a crime from being committed or intervene where one may have been, or to prevent harm to a child or adult. Sharing confidential information without consent is done only where not sharing it could be worse than the outcome of having shared it.
- All staff are also aware that adults can also be vulnerable and know how to refer adults who are in need of community care services.
- All staff know that they can contact the NSPCC whistleblowing helpline if they feel that or organisation and the local authority have not taken appropriate action to safeguard a child and this has not been addressed satisfactorily through organisational escalation and professional challenge procedures.
- We have a whistleblowing policy in place and staff/volunteers know they can contact the organisation Public Concern at Work for advice relating to whistleblowing dilemmas (<https://protect-advice.org.uk/>)

### **Recording suspicions of abuse and disclosures**

- Where a child makes comments to a member of staff that give cause for concern (disclosure), or a member of staff observes signs or signals that give cause for concern, such as significant changes in behaviour; deterioration in general well-being; unexplained bruising, marks or signs of possible abuse or neglect; that member of staff:
  - listens to the child, offers reassurance and gives assurance that she or he will take action;
  - does not question the child in a way that will influence the outcome of the disclosure;

- uses TED guidelines when talking to children about the disclosure – Tell me, Explain to me and Describe to me.
- makes a written record that forms an objective record of the observation or disclosure that includes: the date and time of the observation or the disclosure; the exact words spoken by the child as far as possible; the name of the person to whom the concern was reported, with the date and time; and the names of any other person present at the time. We use the form ‘Welfare concerns and action taken’ for this purpose.
- We ensure that we consistently record pre-existing injuries and take this into account when further injuries arise, and ensure that we do not minimise ‘older’ information.
- These records are signed and dated and kept in the confidentiality file, which is kept securely.
- The members of staff acting as the 'designated person' is informed of the issue at the earliest opportunity, and within one working day, and follows the process for recording and sharing concerns.

#### ***Making a referral to the Education Safeguarding Advisory Team (ESAT)***

- The Early Year’s Alliance’s publication *Safeguarding Children* contains procedures for making a referral to the Education Safeguarding Advisory Team, as well as a template form for recording concerns and making a referral. This is based on ‘What to do if you’re worried a child is being abused’ (DfE 2015).
- We keep a copy of relevant documents alongside the procedures for recording and reporting set down by Oxfordshire Safeguarding Children Board.
- We request a confirmation e-mail when a report of suspected abuse has been made by phone.

#### ***Escalation process***

- If we feel that a referral made has not been dealt with properly or that concerns are not being addressed or responded to, we will follow the Oxfordshire Safeguarding Children Board (OSCB) escalation process.
- We will ensure that staff are aware of how to escalate concerns.

#### ***Informing parents***

- Parents are normally the first point of contact. We discuss concerns with parents to gain their view of events, unless we feel this may put the child or other person at risk, or may interfere with the course of a police investigation, or may unduly delay the referral, or unless it is otherwise unreasonable to seek consent. Advice will be sought from social care, or in some circumstances police, where necessary.
- We inform parents when we make a record of concerns and we also make a note of any discussion we have with them regarding the concern.
- Two members of staff must be present at any subsequent meeting with parents. Discussions must be minuted and signed by all parties present. When encountering difficult or intimidating families, we can refer them to our policies and procedures, and explain that we are doing our job in looking after the interests of the children in our care.
- If a suspicion of abuse warrants referral to the Education Safeguarding Advisory Team (ESAT), parents are informed at the same time that the referral will be made, except where the guidance of the Oxfordshire Safeguarding Children Board does not allow this, for example, where it is believed that the child may be placed in greater danger.
- This will usually be the case where the parent is the likely abuser. In such cases the local authority will inform parents.
- If there is a possibility that advising a parent beforehand may place a child at greater risk the designated person should seek advice from the LCSS service about whether or not to advise parents beforehand, and should record and follow the advice given.

### ***Liaison with other agencies***

- We work within the Oxfordshire Safeguarding Children Board guidelines.
- We have the current version of 'What to do if you're worried a child is being abused' available for parents and staff and ensure that all staff are familiar with what they need to do if they have concerns.
- **For any safeguarding issue, we contact MASH, the local Multi Agency Safeguarding Hub, or the Locality and Community Support Service (LCSS), (SouthTeam) on 0345 050 7666 depending on the nature of the concern.**
- We notify Ofsted of any incident or accident and any changes in our arrangements, which may affect the well-being of children or where an allegation of abuse is made against a member of staff (whether the allegations relate to harm or abuse committed on our premises or elsewhere). Notifications to Ofsted are made as soon as is reasonably practicable, but at the latest within 14 days of the allegations being made.
- Contact details for the local National Society for the Prevention of Cruelty to Children (NSPCC) are also kept.
- We liaise with the local primary schools' designated Safeguarding officers as necessary, and would seek advice to ensure that any concerns are passed onto the school's Safeguarding Officer where this has been advised as appropriate.

### ***Allegations against staff***

- We ensure that all parents know how to complain about the behaviour or actions of staff or volunteers within the setting, which may include an allegation of abuse.
- We differentiate between allegations, and concerns about the quality of care or practice and complaints and have a separate process for responding to complaints.
- We respond to any inappropriate behaviour displayed by members of staff or any other person working with the children, which includes:
  - inappropriate sexual comments;
  - excessive one-to-one attention beyond the requirements of their usual role and responsibilities, or inappropriate sharing of images.
- We will recognise and respond to allegations that a person who works with children has:
  - behaved in a way that has harmed a child, or may have harmed a child
  - possibly committed a criminal offence against or related to a child
  - behaved towards a child or children in a way that indicates they may pose a risk of harm to children
- We follow the procedures of our 'Whistle Blowing Policy'.
- We follow the guidance of Oxfordshire Safeguarding Children Board when responding to any complaint that a member of staff or volunteer within the setting, or anyone living or working on the premises occupied by the setting, has abused a child.
- We ensure that all staff or volunteer know how to raise concerns about a member of staff or volunteer within the setting. We respond to any concerns raised by staff and volunteers who know how to escalate their concerns if they are not satisfied with our response.
- We respond to any disclosure by children or staff that abuse by a member of staff or volunteer within the setting, or anyone living or working on the premises occupied by the setting, may have taken, or is taking place, by first recording the details of any such alleged incident.
- We refer any such complaint immediately to the Local Authority Designated Officer (LADO)/ESAT to investigate: **Jo Lloyd on 01865 810 603. This must be done within the working day of the disclosure or incident.**

We also report any such alleged incident to Ofsted, as well as what measures we have taken. We are aware that it is an offence not to do this.

- We co-operate entirely with any investigation carried out by local authority in conjunction with the police.

- Where the management team and local authority agree it is appropriate in the circumstances, the committee Chair will suspend the member of staff on full pay, or the volunteer, for the duration of the investigation. This is not an indication of admission that the alleged incident has taken place, but is to protect the staff, as well as children and families throughout the process.

### ***Disciplinary action***

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

### **Key commitment 3**

Jack and Jill Pre-School is committed to promoting awareness of child abuse issues throughout its training and learning programmes for adults. It is also committed to empowering young children, through its early childhood curriculum, promoting their right to be strong, resilient and listened to.

### ***Training***

- We seek out training opportunities for all adults involved in the setting to ensure that they are able to recognise the signs and signals of possible physical abuse, emotional abuse, sexual abuse and neglect and that they are aware of the local authority guidelines for making referrals. Training opportunities should also cover extra familial threats such as online risks, radicalisation and grooming, and how to identify and respond to families who may be in need of early help\* and organisational safeguarding procedures.
- The supervisor and deputy undergo the Designated Lead training every 2 years, all staff undergo the Generalist training every 3 years.
- The team of staff and committee refresh their knowledge and understanding of the Safeguarding Policy and safeguarding issues at the time of the review of the policy, which is 6 monthly, also following a training attended, and also when new legislation comes into force.
- We ensure that designated persons receive training in accordance with that recommended by Oxfordshire Safeguarding Children Board.
- One staff and at least one committee member will undergo the 'Safer recruitment' training.
- All staff undergo on-line Prevent training annually, attending safeguarding briefings by Oxfordshire County Council.
- We ensure that all staff know the procedures for reporting and recording any concerns they may have about the provision.
- We also ensure that all staff receive updates on safeguarding via discussion at regular staff meetings

***Planning*** The layout of the rooms allows for constant supervision.

### ***Curriculum***

- We introduce key elements of keeping children safe into our programme to promote the personal, social and emotional development of all children, so that they may grow to be strong, resilient and listened to and so that they develop an understanding of why and how to keep safe.
- We create within the setting a culture of value and respect for individuals, having positive regard for children's heritage arising from their colour, ethnicity, languages spoken at home, cultural and social background.
- We ensure that this is carried out in a way that is developmentally appropriate for the children.



## **Confidentiality**

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

## **Support to families**

- Jack and Jill Preschool believe in building trusting and supportive relationships with families, staff and volunteers in the group.
- Jack and Jill Pre-School make clear to parents our role and responsibilities in relation to child protection, such as for the reporting of concerns, information sharing, monitoring of the child, and liaising at all times with the local authority.
- Jack and Jill Pre-School will continue to welcome the child and the family whilst investigations are being made in relation to any alleged abuse.
- Jack and Jill Pre-School follow the Child Protection Plan or other relevant plans as set by the local authority in relation to the setting's designated role and tasks in supporting that child and their family, subsequent to any investigation.
- We will engage with any child in need plan or early help plan as agreed.
- Confidential records kept on a child are shared with the child's parents or those who have parental responsibility for the child in accordance with the Confidentiality and Client Access to Records policy and only if appropriate under the guidance of the local safeguarding partners.

## **Legal framework**

### *Primary legislation*

- Care Act 2014
- Child Safeguarding Practice Review and Relevant Agency (England) Regulations 2018
- Childcare (Disqualification) Regulations 2009
- Childcare Act 2006
- Children Act (1989 s47)
- Children and Families Act 2014
- Counter-Terrorism and Security Act (2015)
- Counter-Terrorism and Security Act 2015
- Criminal Justice and Court Services Act (2000)
- Data Protection Act 2018
- Disability Discrimination Act 1995
- Equalities Act (2006 & 2010)
- Freedom of Information Act 2000
- General Data Protection Regulation 2018
- Human Rights Act 1998
- Modern Slavery Act 2015
- Protection of Children Act (1999)
- Safeguarding Vulnerable Groups Act (2006)
- Serious Crime Act 2015

- Serious Crime Act 2015
- Sexual Offences Act (2003)
- The Children Act (Every Child Matters) (2004)

#### **Further guidance**

- Working Together to Safeguard Children (HMG, 2018)
- Statutory Framework for the Early Years Foundation Stage 2021
- What to do if you're Worried a Child is Being Abused (HMG, 2015)
- Prevent duty guidance for England and Wales: guidance for specified authorities in England and Wales on the duty of schools and other providers in the Counter-Terrorism and Security Act 2015 to have due regard to the need to prevent people from being drawn into terrorism HMG 2015
- Framework for the Assessment of Children in Need and their Families (DoH 2000)
- The Common Assessment Framework for Children and Young People: A Guide for Practitioners (CWDC 2010)
- Statutory guidance on inter-agency working to safeguard and promote the welfare of children (DfE 2015)
- Information Sharing: Advice for Practitioners providing Safeguarding Services (DfE 2018)
- Disclosure and Barring Service: [www.gov.uk/disclosure-barring-service-check](http://www.gov.uk/disclosure-barring-service-check)
- Multi-Agency Statutory Guidance on Female Genital Mutilation (HMG 2016)
- Multi-Agency Public Protection Arrangements (MAPPA) (Ministry of Justice, National Offender Management Service and HM Prison service 2014)
- Safeguarding Children from Abuse Linked to a Belief in Spirit Possession (HMG 2007)
- Safeguarding Disabled Children in Whom Illness is Fabricated or Induced HMG 2007)
- Safeguarding Disabled Children: Practice Guidance (DfE 2009)
- Safeguarding Children who may have been Trafficked (DfE 2017)
- Child sexual exploitation: definition and guide for practitioners (DfE 2017)
- Handling Cases of Forced Marriage: Multi-Agency Practice Guidelines (HMG 2014)

(Reviewed September 2022)