

Safeguarding and Welfare Requirement: Child Protection

Safeguarding children, young people and vulnerable adults

Policy statement & Commitment

- **Purpose:** We are committed to safeguarding and promoting the welfare of all children in our care. This policy provides clear direction to staff, volunteers, parents/carers, and visitors about expected safeguarding and child protection practices.
- **Aims:** To establish a safe environment, to identify children who are suffering or likely to suffer harm, to respond appropriately, to prevent impairment of children's health or development, and to ensure children grow up in circumstances consistent with safe care.
- **Scope:** This policy applies to all staff (paid, unpaid), students, volunteers, committee members, agency workers, contractors, and visitors.

Statutory Framework & Legal Context

This policy is based on and supports compliance with:

- Working Together to Safeguard Children (2026)
- EYFS Statutory Framework for group and school-based providers (effective 1 September 2026)
- Keeping Children Safe in Education (2026) (used as supplementary guidance where relevant; EYFS and Working Together remain the key requirements for a pre-school setting)
- London Child Protection Procedures / Bromley Safeguarding Children Partnership (BSCP) multi-agency procedures
- Public Interest Disclosure Act 1998
- Children Act 1989 & 2004
- Children and Social Work Act 2017
- Safeguarding Vulnerable Groups Act 2006
- Equality Act 2010
- Data Protection Act 2018 / UK GDPR
- Counter-Terrorism and Security Act 2015 (Prevent duty)
- Child Care Act 2006, Child Safeguarding Practice Review and Relevant Agency Regulations 2018
- Other relevant legislation (e.g., Sexual Offences Act, Criminal Justice Act).

Definitions & Principles

- **Safeguarding:** Protecting children from maltreatment, preventing impairment of children's health or development, ensuring they grow up in safe circumstances, and taking action to enable them to have optimum life chances.

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- **Child Protection:** Activities undertaken to protect specific children who are suffering, or likely to suffer, significant harm.
- **Family Help / Section 17 Support:** In line with Working Together to Safeguard Children 2026, targeted early help and section 17 support should form a more seamless Family Help offer, with coordinated assessment, planning and consistent relationships with children and families.
- **Unborn Children:** Safeguarding, help and protection must also be considered where concerns arise about an unborn child.
- **Inclusive and Anti-discriminatory Practice:** Staff must recognise and challenge racism and discrimination and consider how these, and families' previous experiences of services, may affect engagement and safeguarding.
- **Hidden and Multiple Harms:** Staff remain alert to child sexual abuse, domestic abuse/coercive control, honour- or faith/belief-based abuse, online harms and group-based exploitation, recognising that children may experience several harms at the same time.
- **Extra-familial Harm:** Harm occurring outside the family setting, e.g., exploitation, radicalisation, online harm.
- **Professional Curiosity:** Staff actively monitoring and questioning in a thoughtful, respectful way, not taking explanations at face value.
- **Escalation:** Process for raising concerns when safeguarding is not being addressed appropriately by other professionals or agencies.

Roles and Responsibilities

Designated Safeguarding Lead (DSL)

- Names: Emily Foote & Lucy Hawkins (Deputy Managers)
- Responsibilities: Lead safeguarding, make referrals to children's social care / MASH / BSCP, maintain safeguarding records, support staff, lead multi-agency working, ensure staff training, policy updates, safer recruitment, and high-quality safeguarding culture.

Deputy DSL(s)

- Provide cover for DSL absence, support in day-to-day safeguarding.

Senior Management / Committee / Proprietor

- Ensure safeguarding policy and procedures are effective, implemented, and reviewed.
- Ensure safe recruitment, funding, and support to DSLs and staff.
- Cooperate with safeguarding audits or reviews.

All Staff / Volunteers

- Read, understand, and apply this policy.
- Attend safeguarding training, be alert to signs of harm, record and report concerns promptly.
- Maintain professional boundaries, confidentiality, and participate in multi-agency processes.

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Safe Recruitment & Staffing

Recruitment Principles

- Our recruitment procedures reflect BSCP safer recruitment guidance.
- All applicants are informed that the role involves working with children and is exempt from the Rehabilitation of Offenders Act.
- Enhanced DBS checks and, where the role is eligible, children's barred list checks are obtained before a new employee starts work. From 1 September 2026, enhanced criminal record checks are also required for volunteers, including supervised volunteers, in accordance with the current EYFS requirements.
- No new employee may commence employment before the required DBS check has been received. Volunteers must not undertake duties until the checks required for their role have been completed and suitability confirmed.

Pre-Employment Checks

- Identity, right to work in the UK, full employment history and gaps, and appropriate references are checked before recruitment. References are obtained directly from referees, verified and scrutinised for safeguarding concerns; open references or references supplied only by the applicant are not relied upon.
- Verification of qualifications.
- Checks for any professional disqualification / childcare disqualification.
- The safeguarding policy and recruitment process must clearly set out how the setting ensures that only suitable people are recruited, including checks for staff, students and volunteers as applicable.
- Staff are told that they must disclose relevant information that may affect their suitability to work with children, and the setting acts on any such information in line with EYFS requirements.
- Recording of DBS number, issue date, who carried out the check, and certificate of good conduct if non-UK.

Ongoing Monitoring

- Annual or periodic re-checks (DBS, references) as required.
- Supervision and appraisal process includes safeguarding discussions.
- Staff declared convictions, cautions, warnings must be reported to Manager; internal procedures in place.

Training & Development

- All staff (including volunteers) receive induction safeguarding training before working with children.
- DSLs receive safeguarding training appropriate to their role, including local Bromley referral and escalation arrangements, and renew their training at least every 2 years in line with the EYFS safeguarding training criteria.

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- All practitioners receive safeguarding training that meets the EYFS safeguarding training criteria, with regular updates and support to understand and apply the training in practice. The setting records how training is delivered and how practitioners are supported to implement it.
- Training covers: signs and indicators of abuse (physical, emotional, sexual, neglect), contextual safeguarding, online safety, Prevent / radicalisation, peer-on-peer abuse, early help, low-level concerns, whistleblowing.
- Supervision includes safeguarding reflection, concerns, professional development.
- Whistleblowing: All staff are informed of the setting's whistleblowing procedures, how to raise concerns about safeguarding practice, and how to use external routes where they feel unable to raise a concern internally.

Recognising and Responding to Abuse

Types of Abuse

- Physical abuse
- Emotional abuse
- Sexual abuse (including exploitation)
- Neglect
- Domestic abuse / intimate partner violence
- Extra-familial harm (e.g., child criminal exploitation, trafficking, radicalisation, radicalisation grooming)
- Peer-on-peer abuse
- Female Genital Mutilation (FGM)
- Modern slavery / human trafficking

Indicators of Abuse

Staff are alert to:

- unexplained or suspicious injuries
- behavioural changes, withdrawal, aggression
- sexualised behaviour or language
- neglect (e.g., poor hygiene, chronic lateness)
- signs of trafficking, grooming, radicalisation
- contextual indicators (associations with gangs, exploitation)

Early Help

- Staff identify children and families who may benefit from early help
- Work with parents, the DSL, and other agencies to initiate and monitor Early Help plans
- Use BSCP / Bromley early help threshold guidance
- **Child Absence:** Unexplained or prolonged absence is followed up promptly. The setting considers patterns of absence as a possible safeguarding indicator, makes reasonable attempts to contact parents/carers and emergency contacts, and refers/escalates where welfare concerns remain.

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- **Emergency Contacts:** The setting obtains and keeps up to date more than one emergency contact number for each child wherever possible, so that another responsible adult can be contacted when a parent/carers is unavailable.

Making a Referral

- If a child may be suffering or likely to suffer significant harm, the DSL makes an immediate referral to the Bromley Children and Families Hub / Children's Social Care. In an emergency or where a child is in immediate danger, call 999.
- For non-emergency safeguarding concerns, the DSL follows Bromley Safeguarding Children Partnership threshold and referral procedures and seeks advice from the Children and Families Hub as appropriate. Strategy discussions are convened by statutory agencies, not by the setting.
- Where a crime is suspected (e.g., FGM, sexual abuse), refer to police and social care.
- Record all concerns, decisions, and outcomes in the child's safeguarding file.

Recording Disclosures / Concerns

- Listen, do not investigate; offer reassurance.
- Do not ask leading questions — clarify only.
- Record accurately: date, time, exact words, who was present, who was told.
- Use BSCP-approved recording forms or internal logs.
- DSL reviews child file, adds to chronology, ensures security of records.

Professional Curiosity & Escalation

- Staff encouraged to question, reflect, and challenge decisions if something feels "off."
- If staff believe that a referral / response was inadequate, they escalate via BSCP escalation policy.
- Escalation options: within the setting (manager), multi-agency level (BSCP), LADO in case of allegations, regulator if needed.

Allegations Against Staff (Including Vounteers) - Position of Trust

Definitions & Principles

- Allegation = any concern that a member of staff / volunteer / adult working with children may have:
 - harmed a child;
 - committed a criminal offence against or related to a child;
 - behaved in a way that indicates they may pose risk to children.
- All allegations are taken seriously and treated promptly, fairly, and in line with BSCP LADO procedures.

Process

1. Report immediately to DSL or Head / Senior Manager.
2. LADO notification:
 - Bromley LADO: 020 8461 7644 / 7775
 - Email: lado@bromley.gov.uk

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3. Ofsted notification: From 1 September 2026, Ofsted must be informed of allegations of harm or abuse by anyone living, working or looking after children at the premises, whether the alleged incident occurred at the premises or elsewhere. Significant events must be reported as soon as possible and always within 14 days.
4. Investigation: Multi-agency, led by LADO / Children's Social Care / police as needed.
5. Suspension: May be considered during investigation ("not admission of guilt but to protect all parties"), in consultation with LADO.
6. Outcome & Record-keeping: Maintain secure allegation records; share outcome with staff involved where appropriate.
7. Referral to DBS: If dismissed or resigns with risk to children, notify Disclosure & Barring Service.

Online Safety, Mobile Phones, Cameras & Electronic Devices

Online Safety

- Internet access in the setting is restricted, filtered, and monitored.
- Children do not have unsupervised access.
- Staff and children follow agreed Online Safety rules.
- DSL ensures risk assessments for all digital platforms, monitors usage, and reports concerns (e.g., grooming, cyberbullying).
- **Screen Use:** From 1 September 2026 the setting has regard to the Department for Education's screen-use guidance for early years settings and considers safeguarding, developmental and wellbeing risks when screens are used.

Mobile Phones & Personal Devices

- Staff must not use personal mobile phones, smart watches or other personal electronic devices with imaging or sharing capabilities in the presence of children; such devices are stored securely in accordance with the setting's procedures.
- On outings, staff use only setting-owned devices for photographs or emergency.
- Visitors / parents should not use their personal phones in areas where children are present.

Photography, Images & Consent

- Photographs / recordings are taken only with setting-owned devices, for development records, assessments, or internal displays.
- Parental consent for images is obtained and stored securely; parents asked not to post photos of other children on social media.
- For promotional / external use, consent must explicitly cover publicity; children must not be identifiable (by name or location) in public media.

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Supporting Children & Promoting Resilience

Safer Eating, Toileting, Sleep & Premises Safeguards

Safer Eating: The setting follows the EYFS nutrition guidance unless there is a good reason not to and maintains safe eating and weaning practices, including appropriate supervision and management of choking/allergy risks.

Toileting and Privacy: Children's privacy and dignity during nappy changing and toileting are balanced with safeguarding considerations; practice must not create avoidable opportunities for harm or leave children inadequately supervised.

Safer Sleep: From 1 September 2026 the setting follows the explicit EYFS safer-sleep requirements, including safe sleeping arrangements and appropriate checks/supervision for sleeping children.

Banned Dog Breeds: Registered childcare must not be provided from premises where a banned dog breed is kept or present, in line with the EYFS requirements effective 1 September 2026.

- We promote children's understanding of safety, feelings, relationships, and risk through our curriculum (PS & E, PSED, personal development).
- Key person approach: each child has a trusted adult to build relationship, offer security and encourage expression.
- We encourage children to speak up: worrying thoughts, worries, or behaviours are listened to, validated, and addressed in age-appropriate ways.
- We make provision for specific safeguarding issues (e.g., domestic abuse, mental health, SEND) in multi-agency plans (child protection plans, CIN plans, Early Help Plans).

Multi-Agency Working & Information Sharing

- We work in partnership with Bromley Safeguarding Children Partnership, social care, health, police, education, and other relevant partners.
- Information is shared lawfully, proportionately and promptly in line with the Data Protection Act 2018 / UK GDPR, Working Together to Safeguard Children 2026 and BSCP protocols. Data protection law is not a barrier to sharing information where this is necessary to safeguard a child.
- We follow BSCP guidance on referrals, strategy discussions, and case conferences.
- We participate in multi-agency reviews, case conferences, and safeguarding meetings.
- Where Family Help or statutory plans are already in place, safeguarding assessment and planning should connect with those plans and avoid unnecessary duplication while keeping the child's welfare central.
- We maintain accurate, secure safeguarding records, separate from main child files, and review them regularly.

Confidentiality & Data Protection

- All safeguarding records are treated as confidential, stored securely, and accessed only by DSL or relevant senior staff.
- We share information only on a "need-to-know" basis.

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- Parental consent is sought for information sharing where appropriate but withholding consent will not block a referral if there is risk of significant harm.
- We comply with the BSCP information sharing protocol, GDPR, and Data Protection Act 2018.
- Our privacy notice for parents / carers includes information about safeguarding-related data processing.

Monitoring, Review & Quality Assurance

- DSL maintains a safeguarding log / chronology for all concerns, referrals, and actions.
- We conduct safeguarding audits at least annually, linked to BSCP or internal safeguarding governance.
- This policy is reviewed annually or more frequently after:
 - a safeguarding incident
 - changes in regulation or statutory guidance
 - local or national learning from reviews / serious case reviews
- Staff safeguarding training, induction, and supervision feed into policy review and refinement.
- We report key safeguarding performance / risk to the management committee or governing body regularly.

Communication & Implementation

- This policy is shared with all staff, students, volunteers, and management. They sign to confirm they have read, understood, and agree to comply.
- Parents/carers are informed about the policy: available in the welcome pack, on the website, and upon request.
- A simple child-appropriate leaflet ("How we keep children safe here") is used to explain safeguarding to children.
- Display of key safeguarding contacts (DSL, manager, out-of-hours, police) in staff room and parent foyer.

Key Contacts - Bromley & External Agencies

Policy updated: September 2026. Review at least annually and sooner following statutory, Ofsted, DfE, London Safeguarding Children Procedures or BSCP changes.

Role	Contact
Bromley Children and Families Hub / Children's Social Care	020 8461 7373 / 7309; candfhub@bromley.gov.uk
Out-of-Hours Social Care Duty Team	0300 303 8671

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Role	Contact
Bromley Local Authority Designated Officer (LADO)	020 8461 7644 / 7775, Email: lado@bromley.gov.uk
Bromley Safeguarding Children Partnership (BSCP)	020 8461 7816; BSCP@bromley.gov.uk; bromleysafeguarding.org
Ofsted (Safeguarding / Whistleblowing)	0300 123 3155, Email: whistleblowing@ofsted.gov.uk
NSPCC Helpline	0808 800 5000, Email: help@nspcc.org.uk