



FIRST STEPS (BATH)

SAFEGUARDING & CHILD PROTECTION POLICY AND PROCEDURE

Policy Statement

First Steps (Bath) is committed to creating a culture of safety and maintaining an environment in which the welfare, safety and protection of children are paramount. We do this by:

- Recognising that all children have the right to feel and be safe.
- Protecting them from all forms of abuse including neglect, physical, emotional, and sexual abuse.
- Ensuring that our staff and volunteers are carefully selected and trained to take responsibility for helping the children in their care to be safe.
- Listening to children and parents and giving them the opportunity to raise any concerns.
- Promoting inclusion, anti-discriminatory practice, and British values is part of the Prevent Strategy. (Prevent is about safeguarding people and communities from the threat of terrorism)
- Supporting parental understanding of how to keep themselves and their children safe from relevant risks such as domestic abuse, sexual exploitation, and extremism, including when using the internet and social media and Female Genital Mutilation, (FGM) and child sexual exploitation (CSE).
- Working in partnership with other agencies and with parents/carers to support and strengthen their capacity to safeguard their children.
- Responding swiftly and appropriately to all suspicions or allegations of abuse.
- Appointing a Lead Officer for Safeguarding in each service.
- Ensuring that information is shared appropriately with other agencies in a timely fashion and where possible in partnership with parents but that access to confidential information is restricted to those that need to know within First Steps, and appropriate external authorities.
- Reviewing the effectiveness of our Safeguarding and Child Protection Policy and

activities regularly and working with the LA to effect service improvements following the Serious Case Review, and Child Death Review Process.

- Carefully following the procedures for safer recruitment in the selection of staff and volunteers

Types of Abuse:

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.

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 caregivers)
- Ensure access to appropriate medical care or treatment.

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

Physical Abuse: May involve hitting, shaking, throwing, poisoning, burning, or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces illness in a child.

Sexual Abuse: Involves forcing or enticing a child or young person to take part in sexual activities, including prostitution, whether the child is aware of what is happening. The activities may involve physical contact, including penetrative (e.g., rape, buggery or oral sex) or non-penetrative acts. They may include non-contact activities such as involving children in looking at, or in producing, sexual online images, watching sexual activities, or encouraging children to behave in sexually inappropriate ways.

Emotional Abuse: Is the persistent emotional maltreatment of a child causing severe and persistent adverse effects on their emotional development. It may involve conveying to the children that they are worthless or unloved, inadequate, or valued only as far as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions beyond the child's developmental capability, overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious 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 of a child, though it may occur alone.

All Staff must:

- Maintain a general vigilance and an awareness of the importance of safeguarding children.
- Provide a safe environment for children
- Model good behaviour for children to follow
- Lead Practitioners and above undertake level 3 lead Safeguarding training every 2 years and refresher training every year.
- Remember that the child's welfare is paramount and takes precedence over everything including issues of confidentiality.
- Have a good awareness of issues of safeguarding and child protection to include an understanding of what constitutes sexual exploitation, radicalisation and extremism.
- Share any concerns they have about a family or child (including concerns relating to the family's circumstances or behaviour or concerns that have arisen out of working hours), with their line manager or the lead officer for Safeguarding for their service, as soon as possible.
- Ensure that no unauthorised persons are given access to a child/children in our care.

- Inform children's services staff promptly if they become aware of any absence of a child about whom there are concerns (e.g., subject of a child protection plan) who was expected to attend, together with any reasons given for the absence.
- Avoid behaving in ways or putting themselves in situations that could lead to allegations being made against them, e.g., being alone with a child for unusually lengthy periods or showing excessive interest in them without good reason; talking about their intimate personal lives in front of children or parents etc.
- Ensure that they comply with the First Steps Code of Conduct, e.g., in relation to behaviour; use of mobile phones and cameras and other electronic devices with imaging and sharing capabilities e-safety and social networking.
- Ensure that they comply with the First Steps Staff Employment and Safer Recruitment policy and Staff supervision and Appraisal Policy.
- Have a current criminal record disclosure, complete a declaration form annually and must inform their manager or the Chief Executive immediately if they incur a record in the meantime.
- Any breach of safeguarding procedure will be considered as gross misconduct and investigated following the disciplinary procedure.

Volunteers and students must:

- Work under the direct supervision of a senior staff member.
- Share any concerns they have about a child with their supervisor as soon as possible.

Early Years Services staff who are caring for children, and the Service Manager/safeguarding lead who are working closely with them and their families must:

- Ensure that they have read and are familiar with the Government advice 'What to do if you are worried a child is being abused' (updated) and have signed to confirm this – .
- Ensure that they are familiar with the Staff flowchart for managing Safeguarding allegations against staff and volunteers – copies are kept in the staff rooms and offices.
- Undertake Level 2 child protection training within six months of appointment and update it at least every three years.
- Complete induction training with their Safeguarding officer.
- Be alerted to changes in children's behaviour, appearance, or wellbeing, and to any comments the child makes, or behaviour of the parents/carers, which give(s) cause for concern.
- Promptly record with a signature and a date any unexplained marks or bruises in writing.
- Avoid questioning children directly about an injury unless establish how it occurred, i.e. "How did that happen," or making assumptions about who caused an injury to them – local authority social workers are responsible for resolving these issues.
- Share any concerns they have about a child with their line manager or the lead Safeguarding Officer for their service as soon as possible.
- Share any concerns they have about radicalization.
- Keep factual signed and dated records of such concerns, together with a record of related discussions and actions taken. These records must be made as soon after the event as possible (within one week of a concern being raised).
- Share these concerns with the parent/carer, where possible with another member of staff present, unless doing so might expose the child to further risk.

- Keep a dated record of any injury to a child sustained while attending First Steps, together with the circumstances and any action taken, and inform their line manager and the parent/carer the same day.
- Inform their line manager or the lead Safeguarding Officer immediately of any unexplained or unusual absence of a child about whom there have been concerns.
- Be aware of processes to ensure safe collection of children, identifying appropriate adults and requesting passwords if adults not named are planned to collect a child from nursery.
- Provide appropriate age and stage information to children about their bodies to promote healthy relationships and help protect children from sexual abuse. Staff will use correct anatomical words for children's genitals and teach body autonomy. For example, permission will be sought before undertaking person care.

Service Managers/ Lead Practitioners Managers/Coordinators must:

- Familiarise themselves with the more detailed procedures on the South West Child Protection Procedures website, at [Welcome to the South West Child Protection Procedures \(trixonline.co.uk\)](http://trixonline.co.uk). Involve their lead officer for Safeguarding (if not themselves) in consideration of any concerns raised about a child.
- Share information with other agencies who are working with (or know) the child and family, as part of initial enquiries to establish the level or degree of concern.
- Ensure that the B&NES Children & Families Team (Tel 01225 396312 or 01225 396313) is consulted, or a referral is made to them if there are Safeguarding concerns about a child (Outside office hours contact the Emergency Duty Team: 01454 615165).
- If there is an imminent risk of significant harm, contact the Police 24-hour line on 0845 4567000, or the Police Child Abuse Investigation Team (01225 842702).
- Ensure that all recruitment of staff or volunteers is carried out in accordance with safer recruitment requirements, as set out in First Steps Staff Employment Policy and Procedure, so that the suitability of staff/volunteer appointments is assessed in the context of our commitment to safeguard and promote the welfare of children.
- Maintain an alert awareness of any behaviour exhibited by parents, staff or other adults that could give rise to safeguarding concerns, particularly regarding FGM, sexual exploitation, radicalisation or extremism and know how to access additional help and support. (detailed advice is given in 'Guidance for Safer Working Practice for Adults who Work with Children and Young People, referenced below.)
- Inform the Chief Executive immediately of any allegation against a member of staff, and promptly (but without delaying a referral) of any child who becomes the subject of a Safeguarding or Child Protection investigation, strategy discussion, conference, or plan.
- Ensure that they and their staff receive up-to-date training and information to enable them to carry out their responsibilities for safeguarding children
- Ensure that e-safety is maintained within their service environment, e.g., by monitoring the use of cameras and mobile phones, ensuring only non-networked/ non- internet enabled computers and appropriate software are available for children's use, and that children are not able to access other computers.
- Monitor children's attendance and follow up on poor attendance, lateness, or any concerns about attendance.

Lead Officers for Safeguarding must:

- Take on the responsibilities allocated to managers, as listed above

- Undertake Level 3 child protection training within six months of taking on the leadrole, and attend further training at least every two years, e.g., prevent training or training on FGM or CSE and refresh knowledge and skills at regular intervals, at least annually.
- Liaise with the B&NES Children & Families Triage Team for general advice on operational safeguarding issues, and with the Integrated Safeguarding Officer for strategic issues.
- Maintain and disseminate relevant training information, and contribute to staff awareness, training and development through individual support, staff meetings, inset days etc.
- Advise staff on issues relating to information sharing and confidentiality.
- Ensure that aspects of diversity in traditions and culture, disability, and additional needs, receive full consideration in Safeguarding related matters, while ensuring the child's welfare remains paramount.
- Ensure that staff have information and training on issues affecting vulnerability in families such as domestic violence, drug or alcohol abuse, mental ill health etc.
- Develop working relationships with other local agencies who may be able to provide guidance, support, early intervention, or expertise – e.g., Health Visitors, Southside Family Project.
- Familiarise themselves with the procedure for managing allegations against members of staff, as set out below.

The Chief Executive must:

- Ensure that the services provided are of high quality and are effective at keeping children safe.
- Regularly review the action taken by First Steps staff in respect of children about whom there have been Safeguarding concerns
- Inform the Board of Trustees of any serious or important safeguarding issues that may have significant repercussions in the community, or impact on First Steps reputation, or require changes to policy, staffing or resources.
- Ensure that all staff receive training in safeguarding children, at a level appropriate to their role.
- Ensure that the Senior Management Team conducts a Safeguarding Self-Audit at least once a year, and that this is reviewed midyear.
- Inform and consult the Lead Trustee for Safeguarding of any allegations relating to a member of staff or any serious harm to a child while in First Steps care; respond quickly, and appropriately, and consult with or notify the identified Local Authority Designated Officer (LADO), and Ofsted promptly, within one working day
- Notify the Lead Trustee for Safeguarding, the identified Local Authority Designated Officer (LADO) and Ofsted if any staff leave due to a Safeguarding matter.

Trustees must:

- Identify a Lead Trustee to oversee Safeguarding matters within the First Steps.
- Review First Steps Safeguarding and Child Protection Policy at least once every year
- Receive reports on any serious or important issues arising in relation to Safeguarding and Child Protection Policy or practice within First Steps.
- Ensure that any allegations relating to a member of staff, or any serious harm to a child while in First Steps care, are responded to quickly and appropriately, and that relevant authorities have been consulted and/or notified.

Parents/ Carers whose child/children attend a service provided by First Steps are asked to:

- Advise staff before 10 a.m. each day if their child is unable to attend a booked session and give the reason.
- Inform staff of people who are permitted, and who are not permitted, to collect their child from First Steps on their behalf.
- Notify staff of any injury sustained by their child that could give rise to concerns
- Inform staff of any changes in their circumstances or contact details.

Child Protection Procedure

If a member of staff has concerns about a child's welfare they must:

- Share these concerns immediately and in private with a senior member of staff. If deemed appropriate, the concerns should then be a) recorded in writing on the relevant "concern" form and b) reported to the Children's Services Manager /Safeguarding lead as appropriate. All reports / observations should be signed and dated.
- If, after these discussions (which may include consulting other relevant agencies/triage team), it is considered that the child may be a 'child in need' (which includes a child who is, or is at risk of, significant harm), then an online referral form should be completed. [Concerned about a child or young person \(bathnes.gov.uk\)](http://bathnes.gov.uk) telephone advice can be sought from the **B&NES Children & Families Triage Team, Tel 01225 396312 or 01225 396313 or Out OF Hours Telephone Number: 0145 615165**
- This online referral is to be made by a Manager, Senior Practitioner, or the Lead Officer for Safeguarding.
- All relevant details regarding the child and family must be readily available, together with accurate details of the observation or concern.
- Concerns will be discussed with the parents/carers of the child to make them aware that a referral is being made to social care unless it is considered that this would delay matters inappropriately or that such a discussion will place the child or a vulnerable adult at an increased risk of significant harm.
- The B&NES Children & Families Triage Team should acknowledge the written referral within 1 working day of receipt - if they have not contacted us within 3 working days, they should be re-contacted and asked to confirm its receipt and give feedback.
- See flow chart P:\POLICIES & PROCEDURES\Processes\Master Process\What to Do.pub Appendix 2

If a member of staff is the subject of an allegation of abuse:

- Any allegation made by a child, parent/carer, fellow member of staff or other person, against a member of staff/volunteer or student should be reported immediately to the relevant Service Manager and the Chief Executive. (In the case of a student, the senior manager will inform the relevant college.) Where appropriate/possible, this allegation should be made in writing, signed, and dated by both the person who made the allegation and the person who received it. (If the allegation is against the Chief Executive, the Lead Trustee must be informed immediately.)

The Chief Executive must inform and consult with the Lead Trustee for Safeguarding and should consult the identified Local Authority Designated Officer (LADO). The LADO will consider the information and advise whether the matter can

be investigated internally, or if a possible criminal offence has been committed will liaise with the police and arrange a strategy discussion as appropriate. **The person against whom the allegation has been made must not be informed or an internal investigation undertaken without first consulting with the LADO.**

- Any allegation against a member of staff/volunteer/student will be taken seriously and if LADO advises that an initial internal investigation should be carried out, investigated objectively. The senior managers should refer to the detailed procedures 'Allegations against staff' on the South West Child Protection Procedures website, at <https://www.proceduresonline.com/swcpp/banes/index.html> and other relevant documents referenced below.
- The staff member should be advised to contact the OFSTED Compliance, Investigation and Enforcement Team for support on 0300 123 4666.
- Any witness statements or observations collected during an initial investigation should be recorded in writing, signed, and dated. All documentation should normally be made available to the staff member prior to any meeting with them.
- A member of staff is entitled to have a colleague present for support at any initial meeting. A written record of this meeting must be kept and signed by all parties.
- If following the initial investigation all or any of the above senior managers and Lead Trustee consider there is any substance to the allegation, they will consider appropriate disciplinary action as set out in First Steps Disciplinary Procedure.
- A judgement should be made as to whether the staff member/volunteer/student should be suspended from duty in the first consultation with the LADO. The safety and welfare of children and families will be the primary consideration, but managers must also have regard for the welfare of the accused person and ensure they are offered the appropriate support if suspended.
- Any statutory or disciplinary investigation should be progressed towards a conclusion within agreed timescales. – The LADO's role is to ensure the timeliness of investigation. If a criminal investigation is undertaken, then they will take the lead and keeping all parties informed will be done in conjunction with the LADO.
- The Chief Executive should inform the member of staff of the outcome and decision as soon as possible and notify statutory agencies/ OFSTED and the Lead Trustee/ Board of Trustees as appropriate.
- See flow chart P:\POLICIES & PROCEDURES\Processes\Master Process\What to Do—Chart 2.pub 2m Appendix 3

Records

- Specific and confidential records are set up whenever any worrying changes are observed in a child's behaviour, physical condition, or appearance. They should be signed and dated with name of author printed clearly.
- These records are separate from the usual on-going records of a child's progress and development and are not accessed by anyone in the service other than managers, relevant senior staff, key workers, and other professionals as appropriate.
- An accident record folder is kept at each site, and parents / carers are asked to sign the record when they have been informed of an injury to their child. In addition, an incident record folder is kept on site signed by relevant parties. These records are kept on the child's file - this is helpful when observing patterns of behaviour and reviewing children's progress with their parents/carers.
- All records, information and confidential notes will be kept in separate files in a locked drawer or filing cabinet.

These procedures are in line with the following legislation and guidance:

[Stat guidance template \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk)

[Information sharing: advice for practitioners \(publishing.service.gov.uk\)](http://publishing.service.gov.uk)

[Keeping children safe in education - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

<https://www.gov.uk/government/publications/safeguarding-children-and-protecting-professionals-in-early-years-settings-online-safety-considerations/safeguarding-children-and-protecting->

South West Child Protection Procedures,

[Welcome to the Bath & North East Somerset Community... \(trixonline.co.uk\)](http://trixonline.co.uk)

SWCPP Safer recruiting guidelines

[Managing Allegations against Staff or Volunteers who work with Children \(bathnes.gov.uk\)](http://bathnes.gov.uk)

E-safety strategy (June 2016) – LSCB

First Steps (Bath) - Staff flowchart for managing Safeguarding allegations against staff and volunteers March 2013

B&NES Safeguarding Adults Policy.

http://www.bathnes.gov.uk/sites/default/files/siteimages/joint_safeguarding_adults_policy_final_march_2015.pdf

First Steps follow procedures set out by the Bath and North East Somerset's Community Safety and Safeguarding Partnership and consider of further guidance by OFSTED

Links to other policies:

- 5h. Staff Employment and safer recruitment Policy and Procedure
- 5b. Code of Conduct for Staff Students and Volunteers
- 5j Supervision and Appraisal Policy and Procedure
- 2k. Inclusion Policy and Procedure
- 2i. Health and Safety Policy and Procedure

- 2e. Equal Opportunities and Anti-Discrimination Policy and Procedure
- 2a. Behaviour Management Policy
- 5o. Harassment and Bullying at Work
- 2o. Whistle Blowing Policy & Procedure
- 2a. Confidentiality Policy
- 2n. Social Media Policy & Protocol
 - 5c Disciplinary policy and procedure

24th May 2011

Policy updated by: Roz Lambert, Chief Executive, March 2014

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Reviewed by Trustees July 2018

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Reviewed by SMT March 2021

Reviewed by SMT July 2021 (in line with EYFS (Early

Years Foundation Stage) reforms) Reviewed by SMT

March 2022

Reviewed by SMT May 2023

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Reviewed by SMT March 2024