



MILLFIELD
NURSERIES LTD

**Safeguarding and
Child Protection
Policy 2025/2026**

TERMINOLOGY

1. Safeguarding and promoting the welfare of children refers to the process of protecting children from abuse or neglect, preventing the impairment of health or development, ensuring that children grow up in circumstances consistent with the provision of safe and effective care and undertaking that role so as to enable those children to have optimum life chances and to enter adulthood successfully.
2. Child protection refers to the processes undertaken to protect children who have been identified as suffering or being 'at risk' or 'in need'.
3. Staff refers to all those working for or on behalf of Millfield Nurseries Limited, including full-time, part-time and regular visiting staff, in either a paid or voluntary capacity. This also includes Directors and members of Millfield School.
4. Children refers to all young people who have not yet reached their 18th birthday, and all children on the role of a Millfield Nurseries Limited setting.
5. Nursery Manager refers to the manager of the appropriate nursery, Millfield Nurseries Limited Ltd.
6. Nominated Safeguarding Governor for Millfield Nurseries Limited, Mr Oliver Welsby.
7. Nursery Group Manager for Millfield Nurseries Limited, Mr Adam Hobbins.
8. Directors of Enterprises for Millfield Nurseries Limited, Ms Holly Angelinetta.
9. The relevant inspectorate for Millfield Nurseries is Ofsted who is the regulator.
10. LADO refers to the Local Authority Designated Officer within the Children's Duty team for the authority that the nursery resides in, and or where the child resides.

1. INTRODUCTION

This Policy is in accordance with locally agreed Inter-Agency procedures. A range of documents and guidance for good practice govern Safeguarding and Child Protection work at Millfield Nurseries Limited. Key documents which inform this policy include:

- *Working Together to Safeguard Children 2023, last updated February 2024*
- *What to do if you're worried a child is being abused guidance (2015)*
- *The Children's Act 1989, last updated September 2024*
- *Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings. February 2022*
- *The Prevent Duty Guidance; England and Wales 2023, last updated March 2024*
- *Prevent Duty Guidance Section 26 of Counterterrorism and Security Act 2015*
- *Mandatory Reporting of Female Genital Mutilation October 2015, last updated January 2020*
- *Rehabilitation of Offenders Act 1974, last updated October 2023*
- *Early Years Foundation Stage Statutory Framework 2025*
- *Millfield Nurseries Limited Safer Recruitment Policy*
- *Millfield Nurseries Limited Promoting Positive Behaviour Policy*
- *Millfield Nurseries Limited Whistleblowing Policy*
- *Millfield Nurseries Limited Mobile Phones & Electronic Device Policy*
- *Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018*
- *Keeping Children Safe in Education September 2025*

2. CONTACT DETAILS FOR REFERRING A CONCERN

Each nursery has its own Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Lead (DDSL); these are listed with Appendix A.

In the absence of the DSL or DDSL, the matter should be referred to the Nursery Group Manager, who's contact details are in Appendix A for Millfield Nurseries Limited.

Nominated Safeguarding Governor

The ultimate parent company of Millfield Nurseries Limited is Millfield. **Mr Oliver Welsby** is the **Nominated Safeguarding Governor ("NSG")** for Millfield and it's subsidiaries. The NSG responsibilities include:

- monitoring the implementation of the Safeguarding and Child Protection Policy and Procedures (including an annual assurance review of MNL Single Central Register which is in line with the Suitable People section of EYSF).
- Maintaining close contact with the DSLs
- Working with the DSLs and DDSLs to review the Annual Audits and judge the efficiency with which safeguarding procedures have been implemented and to report on this to the Directors of Millfield Nurseries Limited and Millfield.

The Nominated Safeguarding Governor can be contacted through the Clerk to the Governors, Mr Matthew Shaw – email shaw.m@millfieldschool.com or telephone 01458 444596.

3. AIMS AND OBJECTIVES

Millfield Nurseries Limited fully recognises its responsibilities for Safeguarding and Child Protection and its moral and statutory responsibility to safeguard and promote the welfare, health and safety of all children.

Millfield Nurseries Limited is committed to promote a positive, supportive, and secure environment. Consequently, the overall aim of this policy is to safeguard and promote the welfare of the children in the care of Millfield Nurseries and recognise that all children are entitled to protection from abuse and neglect. It also recognises that all staff and children are entitled to a fair hearing in case of any allegation of abuse. Millfield Nurseries Limited is committed to providing appropriate training and support to all staff in matters of safeguarding including:

- A. Designated Safeguarding Leads (DSL) and Deputy DSLs (DDSL) will undertake formal training every two years, with the DSL also refreshing their safeguarding knowledge annually through local updates or professional networks
- B. Training every two years for all other members of staff.
- C. Information about the elements of training provided to staff and DSLs, and how practitioners are supported to put safeguarding training into practice can be found in Appendix B.
- D. Compliance with all safer recruitment legislation and good practice

- E. Ensuring that all staff have read this policy and a signed record is maintained.
- F. Ensure that all staff are aware of the Prevent duty.
- G. Continuing to develop awareness among all staff of the need for Safeguarding and Child Protection and of their responsibility in identifying children who may be suffering abuse, and in identifying abuse, including signs of abuse and what to look for.
- H. Ensuring that all staff are aware of referral procedures within Millfield Nurseries Limited, feel able to raise concerns and feel supported in their Safeguarding role.
- I. Monitoring children who have been identified as 'at risk' or 'in need.'
- J. Ensuring that Millfield Nurseries Limited recognises the importance of Inter-Agency work by maintaining contact with relevant local agencies.
- K. Ensuring that the concepts of the 'Common Assessment Framework' and 'the Team around the Child' are embedded in all Safeguarding and Child Protection procedures.
- L. Ensuring that key concepts of Safeguarding and Child Protection are integrated into the curriculum across Millfield Nurseries Limited at an appropriate age level.
- M. Creating an environment where children feel secure, have their viewpoints valued, are encouraged to talk and are listened to.
- N. Ensuring that where age appropriate, all children know of at least one adult that they can approach if they are worried or in difficulty.
- O. Ensuring that outside agencies are involved where appropriate.
- P. Ensuring that all staff are aware of how to refer to the Children's Duty Team
- Q. Keeping an open mind about the possibility of a Safeguarding or Child Protection issue arising
- R. Ensuring that staff always act in the interests of the child.
- S. Ensuring all staff participate fully in the provision of Early Help

4. THE POLICY

This policy applies to all staff, directors and volunteers working within Millfield Nurseries Limited and all children. Millfield Nurseries Limited is fully committed to ensuring that the application of this Safeguarding and Child Protection policy is non-discriminatory in line with the UK Equality Act 2010.

This policy will be made available on the website of each nursery and copies will be provided to parents on request. In addition, it will also be made available to all staff within Millfield Nurseries Limited.

This policy is renewed annually by the Nursery Group Manager with the Designated Safeguarding Lead's to ensure that it reflects current legislation and local Safeguarding partnership procedures. This policy sits in conjunction with our other Safeguarding policies.

Millfield Nurseries Limited uses age-appropriate filters on all IT systems within its nurseries to restrict access to illegal and inappropriate online content, including blocking access to extremist or terrorist, extreme or violent pornography or illegal sites. In person monitoring is provided with children only permitted to use devices under adult supervision. Millfield Nurseries Limited further outlines its approach to managing devices with internet access and/or image-sharing capabilities within its *Mobile Phones and Electronic Devices Policy*. This policy operates alongside additional risk-assessed procedures designed to prevent children's access to illegal and inappropriate online content.

Children will only be collected from the nursery by an authorised adult known to the staff.

Children will be accompanied at all times by authorised adults when taking part in the nursery's external

activities, e.g., walks, visits, trips etc.

The Nominated Individual or where appropriate Nursery Manager will notify Ofsted and the Local Authority of any incident or accident that meets the threshold for notification, and any changes in arrangements which may affect the wellbeing of children.

All visitors will sign in and out and state the purpose for the visit. Children will not be left alone with any visitors.

5. SAFEGUARDING CONCERNS

There will be occasions when a member of staff suspects that a child may have a significant welfare issue but there is no real evidence of a Safeguarding or Child Protection concern. It may be relevant to complete a Nursery Concern Form (see appendix C). Signs to be aware of include:

- A. Behavioural changes
- B. Signs of confusion or distress
- C. Physical changes
- D. Bullying or suspicion of bullying

Any member of staff may make a referral to external agencies at any time. However, it is normal practice to pass information to the DSL in the first instance.

If the child begins to reveal information of a Safeguarding or Child Protection nature, the procedures below should be followed. It is better to raise concerns which may not need action than to do nothing or delay reporting. Always act in the interests of the child and maintain an 'it can happen here' attitude.

DSLs operate an 'open door' policy for the reporting of safeguarding issues and child protection concerns when it is deemed appropriate.

Staff need to be aware that child relationships can be abusive and may need to be investigated as a Safeguarding or Child Protection issue. A child may make an allegation of abuse against another child, in which case, the procedure below should be followed. (*See Promoting Positive Behaviour Policy*).

5.1 RESPONSIBILITY OF A DESIGNATED SAFEGUARDING LEAD (DSL) – See Appendix D

- a) To ensure that the Directors ratified Safeguarding and Child Protection policy is understood and followed by all staff within their nurseries.
- b) To appoint and support a DDSL within their nurseries.
- c) Contact the local authority children's social care team to report concerns and seek advice, within 24 hours (if it is believed a child is in immediate danger, we will contact the police), (contact details can be found in Appendix A of this policy).
- d) It is important to remember that concerns need to be raised, not only with the local authority in which the nursery resides, but also that of the child's residency.
- e) Consider if an Ofsted notification is appropriate and discuss with the Nursery Group Manager

- f) Record the information and action taken relating to the concern raised.
- g) Speak to the parents (unless advised not to do so by Local Authority (LA) children's social care team)
- h) Follow up any action taken by the LA social children's care team if they have not contacted the setting within the statutory timeframe.
- i) When children leave the nursery, ensure any relevant personal child protection file is copied to be transferred to their new setting as soon as possible. The original documents must be kept at our nursery. A telephone call to the new setting will also be made alerting them of incoming information. This should be transferred separately from the main child's file, ensuring secure delivery and confirmation of receipt should be obtained.
- j) To inform and liaise with relevant external agencies if there is an allegation against a member of staff.

5.2 The Role of the Nursery Group Manager

- a) To appoint and support a DSL and DDSL in each nursery and ensure their training is renewed every two years.
- b) To keep your own training up to date every 2 years.
- c) To meet regularly to discuss safeguarding practices across the nurseries and continually look for ways of improving safeguarding knowledge.
- d) To ensure the Nursery Safeguarding Policy is kept up to date/ reviewed annually with any changes in legislation across the various local authorities and counties relevant to our nurseries.
- e) To complete an Annual Audit of all Safeguarding procedures, including training across the nurseries
- f) To monitor the DSL and DDSL within each nursery and ensure that the correct safeguarding procedures are known and understood within the nurseries.
- g) To ensure all staff receive regular supervision meetings addressing safeguarding, well-being, and reflective practice
- h) To ensure that the Safer Recruitment processes are carried out with appropriate checks on all staff and that a single central record of identity, qualification and DBS checks is kept for each nursery, and audited regularly by HR.
- i) To keep the Directors informed of changing safeguarding requirements.
- j) To monitor the progress of any major safeguarding concerns or investigation of Nursery procedures by an outside agency.

5.3 The Role of the Company Directors

It is an essential feature of good governance that responsibility is not delegated to others without first ensuring reliable mechanisms for monitoring and evaluation of policy implementation. The MNL Board of Directors will ensure that Directors comply with their duties under legislation and that the MNL policies, procedures and training are effective and comply with the law at all times.

In line with Ofsted Directors' responsibilities also include;

- a) Being the 'registered person' and are responsible for ensuring that there are suitable people working at the companies' settings, and that the requirements of the Early Years Foundation Stage are met.

- b) Appointing a 'nominated individual' who is one of the registered persons who is chosen to represent them and the daycare with Ofsted. This person is the main contact with Ofsted.
- c) Ensuring a companywide approach towards safeguarding by ensuring the involvement of everyone in the company, and ensuring that safeguarding, and child protection are at the fore front of process and policy development.
- d) Ensuring that an effective child protection policy is in place, together with a staff behavior code of conduct policy and behavior policy.
- e) Ensuring that staff induction is in place with regards to child protection and safeguarding and that all staff receive regular, ongoing training.
- f) Ensuring that under the Equalities Act 2010 (which encompasses the Public Sector Equality Duty (PSED)) the company will not unlawfully discriminate against any child or staff member because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation, whilst carefully considering how these individuals are supported.
- g) Ensuring that a member of the company's senior leadership team is designated to take lead responsibility for safeguarding issues (the Designated Safeguarding Lead), approving their job description and ensuring that they receive regular and appropriate training.
- h) Prioritizing the welfare of children and young people and creating a culture where staff and volunteers are confident to challenge senior leaders over any safeguarding concerns.
- i) Where age-appropriate ensuring that children are taught about safeguarding in an age-appropriate way.
- j) Ensuring appropriate filters and appropriate monitoring systems are in place to safeguard children from potentially harmful and inappropriate online material.
- k) Ensuring safeguarding is regularly discussed and outcomes recorded at Directors meetings.
- l) Ensuring that the provision is carrying out inter-agency work and provides a coordinated offer of early help when additional needs of children are identified.
- m) To scrutinise the Annual Audit of all Safeguarding procedures, including training across the nurseries.

6. SAFEGUARDING PROCEDURES

6.1 PROCEDURE FOR WHEN A CHILD MAKES A DISCLOSURE OF ABUSE OR CONCERN

- a) Allow the child to speak freely and lead the discussion.
- b) Recognise the courage the child is showing by making the disclosure.
- c) Recognise that there is a relationship of trust between the child and yourself.
- d) Make it clear at an early stage that confidentiality cannot be guaranteed.
- e) Remain calm and do not overreact.
- f) Listen, be supportive and offer reassurance.
- g) Accept what the child is saying without challenge.
- h) Do not offer any criticism of the child's actions or lack of action.
- i) Allow silences.
- j) Do not ask leading or investigative questions.
- k) Be cautious about any physical contact.
- l) Do not apportion blame or criticise others mentioned in the disclosure.
- m) If the information that has been disclosed needs to be passed on, explain to the child what will happen next.
- n) If the child appears to be 'at risk' or 'in need' the information must be passed on to the DSL (or

- DDSL) as soon as practicably possible
- o) If the child is found to be 'in need' the case will be referred to Social Care
 - p) If the child is found to be 'at risk' Social Care will be contacted as soon as possible
 - q) If the disclosure is of a safeguarding nature, it should be discussed with the DSL without delay.
 - r) Write an account of the conversation so soon as possible, using the Nursery Concern Form. Sign and date the form. Or via the safeguarding section of the Family system including uploading any written attachments. If the body map is used it must be completed with the child fully clothed. Under no circumstances should a member of staff ask a child to remove or adjust clothing. Only parts of the body that are normally visible should be viewed and recorded.
 - s) If the child is in danger of immediate harm, the Police should be contacted first.
 - t) It is not the responsibility of the nursery to investigate suspected cases of abuse prior to informing Social Care and/or the LADO.
 - u) Legal action against the perpetrator of abuse can be compromised by inappropriate actions by individuals or the nursery and by not following this guidance.
 - v) Parents are normally notified (by the DSL) as soon as possible of any concern, suspicion or disclosure of a Safeguarding or Child Protection nature. However, if it is believed that notifying parents could increase the risk to the child or exacerbate the situation, advice will first be sought from Social Care.

6.2 PROCEDURE FOR WHEN AN ALLEGATION OF CHILD ABUSE IS MADE AGAINST ANOTHER CHILD

- a) The disclosure should be listened to and recorded following the steps outlined above.
- b) Behaviour of a bullying nature should be managed following the Promoting Positive Behaviour Policy
- c) Behaviour which raises Safeguarding or Child Protection concerns should be referred to the DSL as soon as possible.
- d) If a disclosure or allegation of abuse is made by a child against another child, it will be referred to Social Care without delay.
- e) Children who abuse others may well have been abused themselves, so Child Protection procedures need to be followed for both the victim and the perpetrator.
- f) Child on child bullying where there is 'reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm' is likely to be reported to social care and all children involved considered to be 'at risk'.
- g) If it is suspected that a crime has been committed, the police will be informed.

6.3 PROCEDURE FOR WHEN AN ALLEGATION IS MADE AGAINST A MEMBER OF STAFF (including volunteers, agency staff and contractors)

- a) Allegations against staff, must be reported straight away to the DSL or DDSL, or in their absence, the Nursery Group Manager who will refer to the guidance and make a decision with regards to appropriate next steps to safeguard.
- b) Allegations that may meet the 'harm threshold - On receipt of an allegation, we will consider if one or more of the following criteria have been met, referred to as the 'harm threshold'. Has the adult, for whom the allegation has been shared:
 - Behaved in a way that has harmed a child or may have harmed a child and/or.
 - Possibly committed a criminal offence against or related to a child and/or.

- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
 - Behaved or may have behaved in a way that indicates they may not be suitable to work with children.
- c) If the allegations does indicate the harm threshold has been met, the LADO will be contacted by the DSL / DDSL (as soon as possible and MUST be within one working day). The LADO will advise on subsequent actions.
 - d) (In borderline cases) informal discussions may be held with LADO. The LADO will advise on subsequent actions which may include the completion of an Allegations Referral Form, which will include names or personal details being disclosed.
 - e) The LADO is pivotal in providing advice when an allegation is made.
 - f) The LADO presides over any abuse allegation or suspicion of abuse directed against anyone working for Millfield Nurseries Limited
 - g) Staff who are concerned about the conduct of a colleague towards a child must remember to act in the interests of the child despite any issues this may cause for the colleague or Millfield Nurseries Limited.
 - h) The Whistleblowing policy enables all staff to raise concerns or allegations in confidence and without prejudice.
 - i) Millfield Nurseries Limited will make every effort to maintain confidentiality and guard against unwanted publicity.
 - j) It is rare for a child to make an entirely false or malicious allegation, although misunderstandings and misinterpretation of events can and do happen.
 - k) Staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly and consistently and to be kept informed of its progress. All unnecessary delays should be eradicated where possible. In the instances where LADO's decision is for the matter to be investigated internally, we will make every effort to do so in a timely manner. In instances where LADO/ and or Police decide it may be a criminal investigation, the Nursery is not able to investigate the matter and instead will support those individuals involved with the process.
 - l) Millfield Nurseries Limited will not conduct internal investigations without prior consultation with the Local Authority Designated Officer (LADO) or, in the most serious cases, the Police, to avoid compromising statutory investigations. Ofsted will be notified within 14 days of any allegation of serious harm or abuse involving a person living or working on the premises (EYFS 2025, Section 3.10)
 - m) All discussions should be reported in writing.
 - n) Communication with both the individual and the parents of the child should be timely and accurate.
 - o) Suspension of a member of staff is not mandatory or automatic and is done without prejudice to the outcome of any inquiry.
 - p) Possible suspension of the member of staff, against whom an allegation has been made, will be carefully considered usually after consultation with the LADO but not always after consultation with LADO. Careful consideration will be given to safeguard the children.
 - q) Malicious, unsubstantiated, and unfounded allegations will not be referred to in employer references.
 - r) Any person (whether employed, contracted, a volunteer or child) who has harmed or poses a risk of harm to a child and who has been removed from working with children, or would have been removed had they not left earlier, will be reported promptly to the Disclosure and Barring Service (DBS)

6.4 PROCEDURE FOR WHEN AN ALLEGATION IS MADE AGAINST THE NURSERY DSL, or NURSERY DDSL

- a) Concerns can be raised by email to the Nursery Group Manager, Adam Hobbins, hobbins.a@millfieldschool.com.
- b) Allegations against the DSL or DDSL which meet the harm threshold will be reported to the LADO within one working day by the Nursery Group Manager.

6.5 PROCEDURE FOR WHEN AN ALLEGATION IS MADE AGAINST THE NURSERY GROUP MANAGER

- a) Concerns can be raised by email to the Director of Enterprises, Holly Angelinetta, angelinetta.h@millfieldschool.com.
- b) Allegations against the Nursery Group Manager which meet the harm threshold will be reported to the LADO within one working day by the Director of Enterprises.

7. SIGNS OF ABUSE

Somebody may abuse or neglect a child by inflicting harm, or by knowingly not preventing harm. Children may be abused in a family, the community, an institutional setting, or more rarely by a stranger (e.g., via the Internet). Most young people who are abused know their abuser. They may be abused by an adult or adults, child or children.

Physical abuse:

- This 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.
- Children regularly collect bumps and bruises, but it does not mean they are being abused. Injuries need to be considered in the light of the age of the child, their stage of development, where injuries are on the body and any explanation given.
- Indicators of physical abuse include bruises, grip marks, cigarette burns, bite marks, swelling, fractures, injuries in an area of the body that is unlikely to be harmed in everyday activity, and injury with no explanation or conflicting explanation.

Fabricated illness: This is also a type of physical abuse. This is where a child is presented with an illness that is fabricated by the adult carer. The carer may seek out unnecessary medical treatment or investigation. The signs may include a carer exaggerating a real illness or symptoms, complete fabrication of symptoms or inducing physical illness e.g., through poisoning, starvation, inappropriate diet. This may also be presented through false allegations of abuse or encouraging the child to appear disabled or ill to obtain unnecessary treatment or specialist support.

Emotional abuse:

- This is persistent emotional maltreatment which is likely to cause serious harm to the child's health and emotional development. It may involve conveying to the child that they are worthless, unloved or inadequate and cause the child to feel frightened, in danger, be exploited or

corrupted. It also includes rejecting or ignoring a child completely, using degrading language or behaviour towards them, rejecting social interaction with them, threatening them, encouraging self-destructive behaviours and allowing a child to witness mistreatment of another.

- Indicators of emotional abuse can be difficult to identify but include developmental lags, acceptance of excessive punishment, over-reaction to mistakes, self-deprecation, fear of new situations, inappropriate emotional response, neurotic behaviour, self-harm or substance abuse. Children suffering emotional abuse may have difficulty forming relationships, seek attention inappropriately, be withdrawn, underachieve or show other signs of disturbed behaviour.

Sexual abuse:

- This is forcing or enticing a child to take part in sexual activities, not necessarily involving a high level of violence, whether or not they are aware of what is happening. This may involve physical contact, penetrative or non-penetrative acts such as masturbation, kissing, rubbing and touching outside clothing. It can also include involving children looking at or watching pornographic material or watching sexual acts and encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males; women and other children can also commit acts of sexual abuse.
- Indicators of sexual abuse include damage to or soreness in genitalia, anus or mouth, sexually transmitted disease, pregnancy, urinary tract infection, inappropriate sexual knowledge, sexually provocative behaviour, personality or character change, poor trust in significant adults, insecure or regressive behaviour or self-harm. Many children who are sexually abused will have no visible signs due to the attacker not wanting to leave evidence.

Neglect:

- This is persistent failure to meet a child's basic physical and psychological needs which is likely to result in serious impairment to their health and development. This may involve a parent or carer failing to provide food, shelter, clothing or a failure to protect from physical or emotional harm or danger, not ensuring adequate supervision, or not allow access to medical care or treatment. It may also include the neglect of a child's basic emotional needs. Where it is deemed appropriate, the DSL may undertake a Neglect toolkit assessment/ Quality of Care Profile.
- Neglect may also result in a child being diagnosed as suffering from 'faltering growth' also known as 'failure to thrive'. This would usually be diagnosed in a young child by a medical practitioner.
- Indicators of neglect include constant hunger or tiredness, frequent lateness or non-attendance, destructive tendencies, poor social relationships, poor personal hygiene, poor general health or untreated medical problems.

Staff also need to be aware of other specific forms of abuse:

Children absent from nursery:

- A child absent from nursery education is a potential indicator of abuse or neglect. A record of children absent from nursery should be kept, particularly if absence is repeated, unknown, unexplained and for long periods of time, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of them being absent in the future. All staff

should be alert to signs to look out for and for the individual triggers to be aware of (as detailed in this policy) when considering the potential safeguarding concerns such as travelling to conflict zones (radicalisation) and FGM.

- The DSL should follow procedures as set out above in terms of investigation and referral within 24 hours.

Female Genital Mutilation (FGM):

This involves procedures that include the partial or total removal of external female genital organs for cultural or other non-therapeutic reasons. The practice is medically unnecessary, extremely painful and has serious consequences for physical and mental health. FGM is illegal in the UK.

Victims of FGM are likely to come from a community that is known to practice FGM. Specific risk indicators include:

- a) Poor integration of the family into UK society
- b) The daughter of a woman who has undergone FGM or where another close family member such as a sister has undergone FGM
- c) The visit of a family elder from the country of origin to a family where a daughter is of FGM age (typically 5 -8 although not always)
- d) A girl talking about FGM; reference by a girl to a special procedure; a girl going on a long or unexpected holiday to the country of origin or where FGM is practiced
- e) Changes in behaviour, medical issues unspecified requested for help from an adult particularly if medically orientated

It is a mandatory requirement to report FGM in a girl under the age of 18. The report should be made to a healthcare professional or the police without delay. If a girl has been recently cut or is at imminent risk 999 should be called. Safeguarding procedures should be followed if FGM is reported or suspected, and specific guidance sought from the police and social care.

Child Sexual Exploitation:

- This involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simple affection) as a result of engaging in sexual activities. This can include seemingly consensual relationships or sexual activity in exchange for attention, accommodation, gifts or illegal substances, to serious organised crime by gangs or groups. It is the imbalance of power which makes the relationship exploitative. Child Sexual Exploitation is illegal in the UK.
- In CSE the perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. Some young people who are being sexually exploited do not exhibit any external signs of this abuse.

Domestic violence:

This is underestimated in the UK. Even if a child does not suffer physical violence in the home, the emotional effect of witnessing violence is significant in children. Children may be hurt by trying to prevent violence. There is a proven link between domestic violence and the abuse of children.

8. PREVENT DUTY

Radicalisation:

The nursery is aware of its responsibilities to safeguard children from the risk of radicalisation. The nursery does this by:

- a) Providing a safe environment for children to talk about issues that may concern them, including sensitive topics such as terrorism and extremist ideology appropriate to the age and stage of development
- b) Identifying children/ individuals who may be susceptible to terrorism, violent or non-violent extremism.
- c) Knowing how to complete a Channel referral and how to seek support for the child/ individual as appropriate
- d) Ensuring all staff receive appropriate safeguarding training and have the knowledge and confidence to identify children/ individuals susceptible of being drawn into terrorism and extremism and challenge extremist ideas.
- e) Ensuring children are safe from terrorist and extremist material when viewing internet accessed material in the nursery, including having in place appropriate levels of filtering and monitoring to restrict children's access to illegal and inappropriate sites.

9. OTHER SAFEGUARDING AND CHILD PROTECTION ISSUES that staff need to be aware of include:

- a) Bullying including cyber-bullying
- b) Illegal substances including drugs
- c) Faith abuse
- d) Gender-based violence and violence against women and girls (VAWG)
- e) Mental health
- f) Child missing from home or care
- g) Fabricated or induced illness

10. CONFIDENTIALITY AND INFORMATION SHARING

Safeguarding and Child Protection issues warrant a high level of confidentiality, not only out of respect for the child and staff involved, but also to ensure that evidence is not compromised by being released into the public domain.

All suspicions, enquiries and external investigations are kept confidential and shared only with those who need to know. Any information is shared in line with guidance from the Local Safeguarding Children's

Partnerships (LSCP).

Safeguarding issues should be discussed with the minimum number of people and usually only with the DSL in the first instance.

Safeguarding records should be carefully kept in a secure facility with limited access. Child Protection records are kept in a secure facility by the DSL separate from other child records, utilising a digital system called Family. Safeguarding information on Family is restricted to DSL's and DDSL's only.

When a child leaves our setting, we have a duty to share any safeguarding concerns and records with the child's new setting/ school. We will seek any safeguarding records from a child's previous setting when they join our setting.

11. INFORMING AND SUPPORTING PARENTS

At Millfield Nurseries Limited, safeguarding and promoting the welfare of children is our highest priority. We believe that maintaining open communication with parents is essential in ensuring the safety and well-being of all children. Below is our policy for informing parents when a safeguarding concern arises:

11.1 Parental Notification

We aim to communicate with parents as soon as possible when a safeguarding concern is raised, ensuring they understand the nature of the concern and any steps that need to be taken. We may ask for additional information to better understand the situation. We will make it clear that the call or meeting is taking place in the context of safeguarding.

The DSL will clearly explain why the concern has been raised and discuss any next steps or actions, while maintaining sensitivity and professionalism.

In the event that a child presents with bruising/injuries that the Nursery's Safeguarding training has identified as immediate reportable situations to Social Services, the Nursery is duty bound to report these cases. Once the concern has been shared with Social services, they take the lead, and the Nursery must follow their directives. Where possible, the Nursery will provide parents with clear information about the process, however, this may not always be the case. Safeguarding is our top priority, and the Nurseries follows the guidelines set by their regulator.

11.2 Sensitive and Supportive Approach

We recognise that safeguarding concerns can be distressing for parents. The DSL will handle these conversations with sensitivity and professionalism, ensuring parents are supported through the process wherever appropriate.

The DSL will provide emotional and practical support to parents during this difficult time. We will work with them, where appropriate, to ensure they feel informed and involved.

Parents will be referred to external support services if needed, such as family support workers, counseling services, or helplines.

11.3 Working Together

We value the trust parents place in us and strive to work collaboratively to ensure the safety of all children. We are committed to supporting parents and families through any safeguarding processes.

We encourage parents to be actively involved, where suitable, in understanding the concerns raised and any safeguarding actions. We will seek parental input and collaborate with them to ensure the child's best interests are prioritised.

In cases where we are advised by Social Care or safeguarding authorities not to involve parents immediately (for example, if a parent or family member is the suspected abuser), we will explain the process as soon as it is safe and appropriate to do so.

11.4 When Parental Notification May Not Be Suitable

There are certain circumstances where it may not be appropriate to inform parents immediately:

In such cases, we will follow the guidance of Social Care or the investigating child protection officers. Parents will be informed by the appropriate authorities if necessary.

If notifying the parent might place the child at further risk of harm.

If the concern involves suspected abuse by a parent or family member.

If Social Care or any other safeguarding agency advises against notifying the parent.

11.5 Seeking Parental Consent for Referrals

We will always seek parental consent before making a referral to Social Care, except in situations where doing so may increase the risk of harm to the child. If consent cannot be obtained for this reason, we will proceed with the referral based on the child's best interests and in line with legal requirements. There are certain circumstances where a referral to Social Care is mandatory under safeguarding guidelines. These situations arise when there is a significant concern about a child's safety or welfare. Below are the key circumstances that typically require a mandatory referral:

- **Suspected Physical, Emotional, or Sexual Abuse** If there is reasonable suspicion or evidence that a child is being physically, emotionally, or sexually abused, a referral to Social Care is mandatory. This includes concerns about neglect or mistreatment that could cause significant harm to the child.
- **Serious Neglect** A referral is mandatory if there is evidence or suspicion that a child is experiencing neglect that is significantly affecting their development, health, or safety. Neglect may include failure to provide basic needs such as food, shelter, medical care, or supervision.
- **Injuries to Non-Accidental Sites** When a child presents with injuries in areas commonly associated with non-accidental harm (e.g., bruising on the face, neck, ear or torso), this may indicate abuse. In these cases, a referral must be made to Social Care for further investigation.
- **Child Discloses Abuse or Harm** If a child directly discloses that they are being harmed or abused, this must be taken seriously, and a referral to Social Care is required, even if there is no physical evidence or the disclosure seems unclear.
- **Signs of Radicalisation** Under the Prevent Duty, if there is a concern that a child, or a member of the family is at risk of radicalisation or being drawn into terrorism, a referral to Social Care is required. The referral may also involve the local Prevent team.
- **Domestic Abuse in the Household** If there is evidence or suspicion that a child is living in an environment where domestic abuse is taking place, and this poses a risk to their safety or well-

being, a referral to Social Care is mandatory. This applies even if the child is not the direct victim but may be witnessing the abuse.

- **Unexplained or Sudden Changes in Behaviour or Well-being** If a child exhibits sudden and unexplained changes in behaviour, emotional state, or physical condition that suggests they may be at risk of significant harm, this could warrant a referral to Social Care.
- **Concerns of Harm from Parents or Carers** If there is suspicion that a parent or family member is responsible for causing harm to the child, or if the child is in an unsafe environment, a referral to Social Care is required. In these cases, parents may not be informed immediately to avoid placing the child at further risk.
- **Child at Risk of Harm or Serious Injury** If a child is at immediate or serious risk of harm or injury, such as through harmful cultural practices (e.g., Female Genital Mutilation or forced marriage), a referral to Social Care must be made urgently.

In these mandatory referral situations, the nursery must follow local safeguarding procedures and work closely with Social Care and other safeguarding agencies to ensure the child's safety.

11.6 Respect for Confidentiality

We maintain the confidentiality of all safeguarding concerns and will only share information with those who need to know in order to protect the child.

Parents can trust that their concerns and discussions will be handled discreetly, and sensitive information will be kept confidential unless legally required to share it.

11.7 Clear Pathways for Further Questions and Concerns

We encourage parents to ask questions if they are unsure about any aspect of the safeguarding process. Our Designated Safeguarding Lead (DSL) is available to provide further clarification and offer ongoing support.

Should parents have concerns or wish to seek external advice, we will provide details of the safeguarding agencies, including local authorities and organisations like the NSPCC.

11.8 Referral to Social Care

If a referral to Social Care or another agency is required, we will explain the reasons for this referral and clarify that it is part of our responsibility to safeguard the child, not an allegation against the parents.

We will always seek parental consent before making a referral unless it could put the child at greater risk, or we have been advised not to do so. The nursery does not investigate a safeguarding concern as this is the role of Social Care and Child Protection officers.

Our aim is to work together with parents to safeguard children, offering understanding, support, and guidance every step of the way.

12. THE ROLE OF SOCIAL CARE IN INVESTIGATING A SAFEGUARDING CONCERN

When a safeguarding concern is raised and referred to Social Care, their primary role is to ensure the safety and well-being of the child. They follow a structured process to assess the situation and determine the most appropriate course of action. Below is an overview of Social Care's role in investigating a safeguarding concern:

12.1 Initial Assessment

Upon receiving a referral, Social Care will conduct an initial assessment to determine the nature and seriousness of the concern. This involves gathering information from the referrer (e.g., the nursery), reviewing the child's background, and considering any known risks.

Social Care will decide whether the concern meets the threshold for further investigation. If the concern is deemed serious enough, a formal investigation will proceed.

12.2 Strategy Meeting or Discussion

If the concern involves potential significant harm to the child, Social Care may convene a strategy meeting. This meeting typically involves key professionals such as the police, health services, and the nursery or school. The goal is to share information, assess the level of risk, and plan how the investigation should proceed.

The strategy discussion will decide whether there is a need for immediate protective action and what steps are needed to ensure the child's safety.

12.3 Child Protection Investigation (Section 47 Enquiry)

Under Section 47 of the Children Act 1989, Social Care is legally required to investigate if there are reasonable grounds to suspect that a child is suffering or likely to suffer significant harm.

The investigation typically involves:

- **Interviews with the Child:** Social Care, often working with the police or other professionals, may speak directly to the child (if appropriate for their age and understanding) to gather their perspective and any disclosures.
- **Interviews with Parents or Carers:** Parents or carers are usually interviewed to discuss the concerns and provide their perspective. In cases where they are suspected of harm, these interviews may be conducted with caution or delayed.
- **Home Visit and Observations:** Social Care may visit the child's home to observe their living environment and any interactions with family members. This helps assess the child's safety and well-being.

12.4 Collaboration with Other Agencies

Social Care works closely with other agencies such as health services, schools, and the police to gather relevant information. This multi-agency approach ensures a comprehensive understanding of the child's situation and the risks they may face.

The police may be involved if there is suspicion of a criminal offence, such as physical or sexual abuse.

12.5 Risk Assessment and Decision-Making

Social Care assesses the level of risk to the child based on the information gathered. They consider factors such as the severity of the concern, the child's developmental needs, and the capacity of the parents or carers to protect the child. Following the assessment, Social Care will make decisions about the next steps, which may include:

- **No Further Action:** If the concern does not meet the threshold for further intervention, Social Care may decide to take no further action. However, they may provide advice or refer the family to early help services for additional support.
- **Ongoing Monitoring:** In cases where the risk is not immediate but still a concern, Social Care may put in place a Child in Need plan. This involves ongoing support and monitoring to ensure the child's well-being.
- **Immediate Protective Action:** If the child is deemed to be at significant risk of harm, Social Care may take immediate protective action, such as removing the child from the home or applying for a court order to safeguard the child.

12.6 Child Protection Conference

If the investigation finds that the child is at risk of significant harm, a Child Protection Conference may be convened. This meeting brings together professionals from different agencies, along with the family (where appropriate), to develop a Child Protection Plan. The plan outlines the steps needed to protect the child and support the family.

The conference will review the investigation's findings, assess the level of risk, and make decisions about ongoing protection and support measures.

12.7 Ongoing Support and Monitoring

Following the investigation, Social Care may continue to support and monitor the child and family, either through a Child Protection Plan or a Child in Need Plan, depending on the level of risk.

Social Care will regularly review the situation and work with the family and other agencies to ensure that the child's safety and well-being are maintained.

12.8 Legal Intervention (If Necessary)

In extreme cases where the child is in immediate danger, Social Care may apply to the court for legal orders to protect the child. This could involve emergency protection orders, care orders, or supervision orders to remove the child from the home or place restrictions on parental access.

12.9 Informing the Parents

If the parents were not initially informed due to concerns that it might place the child at further risk, Social Care, along with other investigating agencies, will handle informing the parents as the investigation progresses. They will ensure that parents are involved in the process where appropriate and provided with support.

Parents will receive clear communication about the investigation and any decisions made, including referrals for additional support if needed.

12.10 Conclusion

Social Care plays a vital role in ensuring the safety and protection of children when safeguarding concerns arise. Their thorough investigation process is designed to assess the risk to the child, collaborate with other professionals, and take necessary steps to protect the child while working with families to provide support and guidance.

13. STAFF TRAINING AND INFORMATION

All staff will be regularly trained, relevant to their job roles and responsibilities, in Child Protection and Safeguarding (Appendix B). This training will be approved by the Local Safeguarding Children Board and may consist of completing an online module, training delivered by the DSL or training delivered by Local Safeguarding Children Board.

The DSL (who is usually the Nursery Manager) is responsible for the organisation, along with the Nursery Group Manager, and the standard of training within their nursery. Temporary, voluntary and visiting staff will be given a copy of this policy for their information, including a brief induction so that they too know how to report concerns appropriately.

Volunteers, students and apprentices working with children at any of the Millfield Nurseries settings are always supervised by a qualified and experienced member of staff.

Other Millfield Nurseries Limited policies to work in conjunction with Safeguarding:

- Accident, Pre-Existing Injury & First Aid Policy
- Confidentiality Policy
- Food, Mealtimes & Dietary Needs Policy
- Health & Safety Policy
- Incident Policy
- Information Sharing Policy
- Lost Child Policy
- Medication Policy
- Mobile Phones & Electronic Device Policy
- Outings Policy
- Promoting Positive Behaviour Policy
- Safer Recruitment Policy
- Special Educational Needs & Disability Policy
- Visitors & Contractors Policy

APPENDIX A – NURSERIES CONTACT INFORMATION FOR REFERRAL

Dolphins Childcare Centre		
Designated Safeguarding Lead (DSL)	Dawn Jeffrey	01278 661333 dolphincc@btconnect.com
Deputy Designated Safeguarding Lead (DDSL)	Sarah Cornish	01278 661333 dolphincc@btconnect.com
MNL – Nursery Group Manager	Adam Hobbins	07842 445940 hobbins.a@millfieldschool.com
MNL – Director of Enterprises	Holly Angelinetta	01458 442291 angelinetta.h@millfieldschool.com
Local Authority Designated Officers (LADO)	Anthony Goble Stacey Davis	0300 123 2224 sdinputters@somerset.gov.uk
Somerset Direct		0300 123 2224 childrens@somerset.gov.uk
Ofsted		0300 123 1231
Police Control Room		101
Anti-Terrorism Hotline		0800 789 321
DofE Counter Extremism Helpline		02073 407 264 (Office Hours) Counter.extremism@education.gsi.gov.uk

APPENDIX B – SAFEGUARDING TRAINING

Safeguarding training is delivered through the following:

1. Induction at the point of a staff member joining the Company which covers:
 - What is meant by the term safeguarding.
 - The main categories of abuse, harm and neglect and signs to look out for.
 - How to respond, record and effectively refer concerns or allegations related to safeguarding in a timely and appropriate way.
 - Millfield Nurseries Limited Safeguarding and Child Protection Policy.

Online Safeguarding Training (updated every 2 years) which includes the following elements as a minimum:

- The factors, situation and actions that could lead or contribute to abuse, harm or neglect.
 - How to work in ways that safeguard children from abuse, harm and neglect.
 - How to identify signs of possible abuse, harm and neglect at the earliest opportunity.
 - Legislation, national policies, codes of conduct and professional practice in relation to safeguarding.
 - Roles and responsibilities of practitioners and other relevant professionals involved in safeguarding.
2. Training for the designated safeguarding lead (DSL) will take account of any advice from the local safeguarding partners or local authority on appropriate training courses. In addition to the areas set out in paragraph 1, training for the DSL will cover the elements listed below:
 - How to build a safe organisational culture.
 - How to ensure safe recruitment.
 - How to develop and implement safeguarding policies and procedures.
 - How to support and work with other practitioners to safeguard children.
 - Local child protection procedures and how to liaise with local statutory children's services agencies and with the local safeguarding partners to safeguard children.
 - How to refer and escalate concerns
 - How to manage and monitor allegations of abuse against other staff.
 - How to ensure internet safety.
 3. After successfully completing online Safeguarding Training, the DSL or DDSL will arrange a follow-up meeting with the staff member. During this meeting, the DSL or DDSL will explore the staff members' understanding of safeguarding and their responsibilities within the

nursery to deliver them.

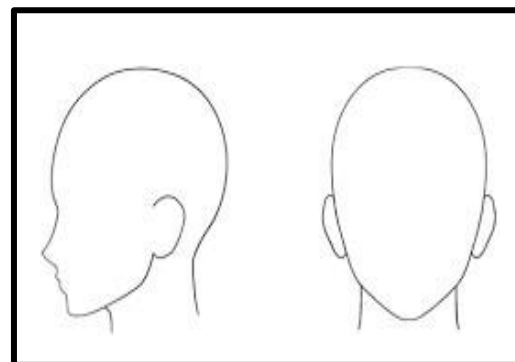
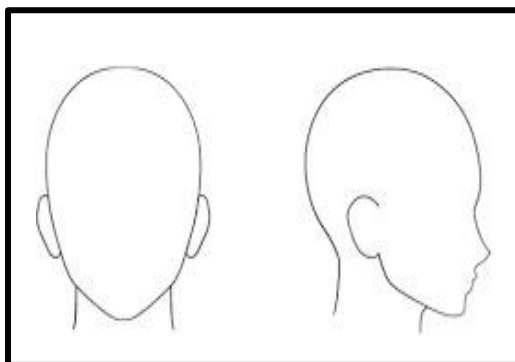
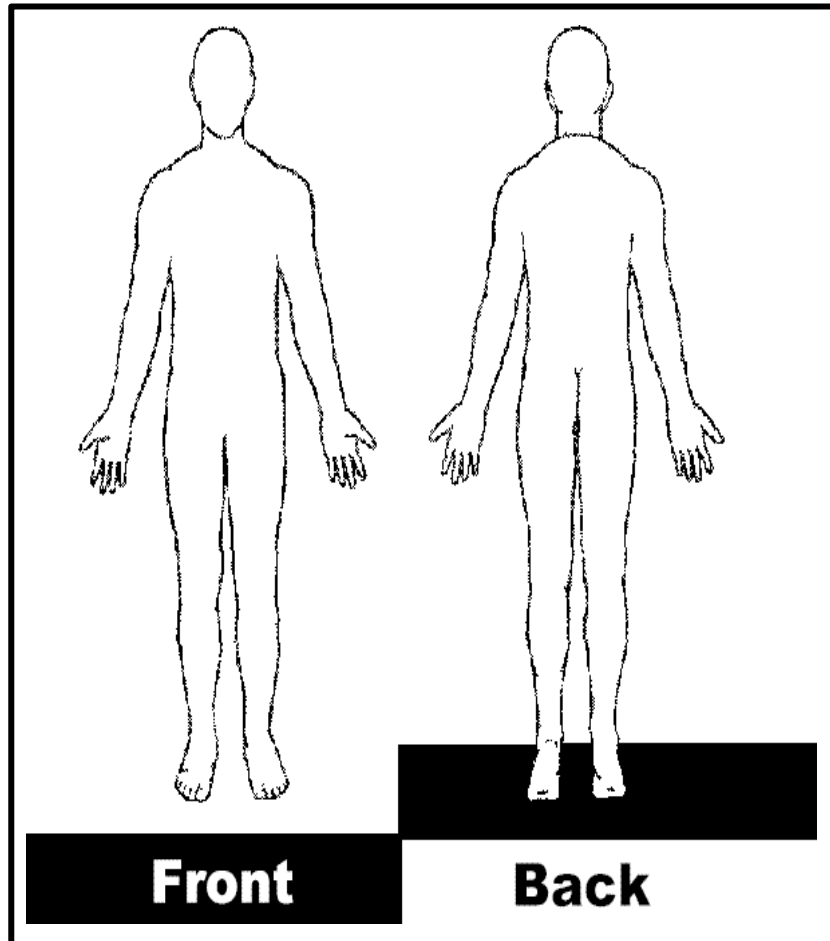
4. DSL's and DDSL's complete daily risk assessments for their nursery. This includes speaking to staff about safeguarding, providing them with scenarios and gaining insight into their safeguarding knowledge, which is used to continuously assess staff understanding of their role in safeguarding children.
5. Regular staff meetings are held at our nurseries and are led by the DSL. These are used to provide regular safeguarding training updates.

APPENDIX C – SAFEGUARDING CONCERN FORM

Date:	Person Raising Concern:	
Name of Child:		
Details of concern raised (who/what/when/where, names of witnesses, include documentation)		
Details of conversation (use children’s and adults’ actual words)		
Other people who witnessed the conversation		
Further information and details		
Name of DSL receiving concern		
Action taken by DSL:		
Documents relating to concern.		
Name	Date	Location

**Use and complete the body map if appropriate to record
Safeguarding or Child Protection concerns.**

DO NOT REMOVE CLOTHING



Appendix D

Designated Safeguarding Lead (DSL) Job Description

1. To lead in facilitating the development of Safeguarding and Child Protection policies, training and procedures and guidance for each nursery, ensuring that the Safeguarding and The Child Protection Policy is reviewed annually and approved by the Directors.
2. To ensure that the Nursery Safeguarding and Child Protection Policy is reviewed at least annually by the Nursery Group Manager and that the procedures and implementation are updated and reviewed regularly.
3. To ensure that robust online safety procedures are in place and are followed that are appropriate to the age of the children. To make sure that internet use via the nursery network is both monitored and filtered.
4. To undertake appropriate Child Protection Training at least every 2 years in order to:
 - Understand the assessment process for providing Early Help and intervention, e.g., through locally agreed common and shared assessment processes such as Early Help assessments.
 - Understand how the local safeguarding board conducts Child Protection Case Conferences and be able to attend these effectively when required to do so.
 - Ensure each member of staff has access to and understands the Nursery's Safeguarding and Child Protection Policy and procedures.
5. To undertake appropriate, Prevent Training:
 - To ensure staff can identify children at risk from being drawn into terrorism.
 - Ensure that staff are aware of the DfE Prevent Duty documentation.
 - Ensure that all staff receive appropriate Prevent Duty training.
6. To ensure that all staff are provided with induction training, they are aware of the identity of their DSL and Deputy DSL and have signed to say they have read:
 - The Nursery's Safeguarding and Child Protection Policy
 - The Nursery Whistleblowing policy
 - Are aware of all other Millfield Nurseries Limited policies concerned with child welfare.
7. To provide training and support, on a regular basis, and in accordance with the requirements of the local authority to all staff (including newly appointed) and volunteers who work with children so that they are aware of the Nursery Safeguarding and Child Protection arrangements. To also ensure that all new staff are aware of the Whistleblowing policy.
8. To ensure that all staff are aware of the risks of radicalisation in young people; how to identify signs of radicalisation and how to recognise those children most susceptible to radicalisation.
9. To keep staff aware of Safeguarding and Child Protection procedures.
10. To have an understanding of the Local Authority procedures.
11. To refer allegations of cases of suspected abuse to Children's Social Care or Police as appropriate, making contact with either of them within 24 hours of a disclosure or suspicion of abuse, in writing or with written confirmation of a telephone referral.

12. To make prompt contact with the LADO in relation to allegations made against someone working at the nursery and/or with the police if a criminal offence is suspected.
13. To receive and coordinate referrals, arranging action and reviewing services for children and families.
14. To maintain accurate, confidential and up-to-date documentation (written or online) on all cases of Safeguarding and Child Protection, ensuring that all records are forwarded to any new setting the child may attend, and the appropriate request made of the previous setting for the Safeguarding and Child Protection records.
15. To work directly with children 'in need' and their families to promote, strengthen and develop the potential of parents/carers and their children to prevent children becoming looked after and/or suffering significant harm.
16. To support the care of children where their living arrangements are at risk of breakdown (including Local Authority placements).
17. To ensure that children who have suffered or are at risk of suffering serious harm are reported to Social Care immediately and that a multi-agency assessment is requested.
18. To ensure that children who are victims of abuse are supported appropriately and sensitively and that all actions assigned from planning and intervention meetings are successfully carried out and monitored.
19. To have a knowledge of multi-agency working in the local area.
20. To inform the Nursery Group Manager of Safeguarding issues, especially ongoing enquiries under Section 47 of the Children Act 1989 and Police investigations, including Safeguarding Review meetings.
21. To act as a source of support, advice and expertise to staff on matters of Safeguarding and Child Protection and when deciding whether to make a referral by liaising with relevant agencies.
22. To ensure that the Nursery is always presented positively within and beyond the setting and to encourage a culture of listening to children and taking account of their wishes and feelings on any measure the Nursery might have taken to protect them.
23. To ensure that staff are aware of training opportunities and the Local Authority guidance.
24. To develop effective links with relevant statutory and voluntary agencies.
25. To ensure that the Local Authority/ Relevant Inspectorate has access to the Nursery Safeguarding and Child Protection policy.
26. Attend and participate in Child Protection Conferences and planning and review meetings whilst working closely with colleagues in Children's Services and meetings with other Agencies, as required.
27. To maintain confidentiality at all times.
28. To identify vulnerable children within the Nursery and ensure that all staff are made aware of who these children are.
29. To ensure a record is kept of staff Safeguarding and Child Protection training.
30. To ensure that Safeguarding and Child Protection is included in the Nursery curriculum, appropriate to child age.
31. To undertake other duties that relate to Safeguarding and Child Protection matters.

APPENDIX E

Staff Code of Conduct Introduction

Millfield Nurseries Limited takes pride in the friendly and supportive atmosphere that exists between members of staff and children. The lack of barriers between children and staff creates a happy and productive working atmosphere but all colleagues must be aware that they have a professional relationship with children and that discretion must be always exercised. There is a difference between being friendly towards children/ parents and behaving as their friend.

Allegations of unprofessional or improper conduct can arise and it is the duty of all members of staff to always behave professionally. The purpose of this Code of Conduct is to ensure that colleagues know what acceptable and unacceptable behaviour is to maintain the safety of the children and guard against allegations of impropriety.

It is important that all adults working with children understand the nature of their work and their responsibilities relating to it, places them in a position of trust. At Millfield Nurseries Limited, the welfare of children is paramount, so it is the responsibility of all adults to safeguard and promote the welfare of children.

Members of staff are responsible for their own actions and behaviour and should avoid any conduct, which would lead a reasonable person to question their motivation and intentions. This guidance is not exhaustive and is designed to set out principles rather than to give detailed and specific advice as the circumstances in which staff work vary.

Duty of care

This is the duty, which rests upon each Nursery, and the staff within it, to ensure that all reasonable steps are taken to safeguard children involved in any activity for which the nursery is responsible. All staff have a duty to keep children safe and protect them from sexual, physical and emotional harm. Children have the right to be safe and to be treated with respect and dignity.

Members of staff are accountable for the way in which they exercise authority, manage risk, use resources and protect children from discrimination and avoidable harm. The duty of care is, in part, exercised through the development of respectful, caring and professional relationships between staff and children and behaviour by staff that demonstrates integrity, maturity and good judgement.

The Nursery has a duty of care towards employees, which requires the provision of a safe working environment for staff and guidance about safe working practices. Staff who are subject to an allegation will be supported and the principles of natural justice applied.

Staff should not engage in any discriminatory behaviour towards children or colleagues of either a positive or negative nature.

Appendix F

Low Level Concerns

Millfield Nurseries Limited has processes and procedures in place to manage any safeguarding concerns about a staff member (including supply staff and contractors). 6.3 of this policy details the procedures that should be followed if an allegation of abuse by a member of staff is made.

It is also our duty to ensure that low level concerns, which don't meet the allegation threshold, about a member of staff are also recorded so that any potential patterns of inappropriate behaviour can be identified.

A low-level concern is any concern, no matter how small, that an adult may have acted in a way which is:

- a) Not consistent with the Code of Conduct found in appendix E of this policy.
- b) Related to their conduct outside of work that has caused a sense of unease about that adult's suitability to work with children.

Staff do not need to determine whether the actions of an adult can be defined as a low-level concern or whether they reach the allegation threshold they just need to make a report. It is the role of the DSL, if necessary, to make this decision.

Any member of staff can report a low-level concern about themselves or a colleague to their line manager, the DSL of the nursery, or alternatively, the Nursery Group Manager.

Staff should feel confident that they can self-refer when, for example they have found themselves in a position which could be misinterpreted, which might appear compromising to others and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

All low-level concerns should be recorded in writing as part of a professional interview or by email. The record should include:

- a) The details of the concern
- b) The context in which the concern arose.
- c) The names of the individuals (children and staff) involved.
- d) The name of the reporting member of staff, if anonymity is not wanted.

Records of low-level concerns will be kept confidentially and securely and comply with GDPR legislation. In most cases, records will be destroyed 7 years after the employee leaves.

Records will be regularly reviewed to:

- a) Identify patterns of concerning, problematic or inappropriate behaviour.
- b) Aid decisions on the appropriate course of action to be taken.
- c) Provide evidence if the records meet an allegation threshold and a referral to the LADO is made.
- d) Help in the identification of possible wider cultural issues within the nursery or nursery group that enabled the concerned behaviour to occur and decide on a course of action to minimise the risk of repeated low-level concerns.

Spectrum of behaviour

Allegation

Behaviour which indicates that an adult 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

Low-Level Concern

Any concern – no matter how small, even if no more than a ‘nagging doubt’ – that an adult may have acted in a manner which:

- a) is not consistent with an organisation’s Code of Conduct, and/or
- b) relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult’s suitability to work with children.

Appropriate Conduct

Behaviour which is entirely consistent with the organisation’s Code of Conduct, and the law.

Policy owner:	Finance Director – Millfield Nurseries Limited
Audited on:	October 2025
Review by the Safeguarding Governor and MNL Governors	February 2026
For next review by	February 2027
Publication	Locally at Nursery, Family