SAFEGUARDING CHILDREN AND CHILD PROTECTION POLICY

The Designated safeguarding lead is: Ginia Brown

The Deputy Designated safeguarding leads are: Andrea Dugay, Hazel Jones

The Designated officer is: Robert Sampson (Trustee)

Aim
Phoenix Early Learners is committed to safeguarding children, young people and vulnerable adults and will do this by putting young people and vulnerable adult's right to **be 'strong, resilient and listened to** 'at the heart of all our activities.

Phoenix Early Learners' 'four commitments' are drawn from the Early Years Alliance and are broad statements against which policies and procedures across the organisation are drawn to provide a consistent and coherent strategy for safeguarding children young people and vulnerable adults. The four key commitments are:

1. Phoenix Early Learners is committed to empowering children, young people, and vulnerable adults, promoting their right to be 'strong, resilient, actively listened to, and heard'.
2. Phoenix Early Learners upholds a culture of safety in which children, young people and vulnerable adults are protected from abuse and harm in all areas of its curriculum and service delivery.
3. Phoenix Early Learners is committed to preventing harm and responding promptly and appropriately to all incidents or concerns of abuse that may occur. Working with statutory agencies to achieve the best possible outcomes for every child.
4. Phoenix Early Learners is dedicated to increasing safeguarding confidence, knowledge and good practice throughout its training and learning programmes for adults, advocating support and representation for those in greatest need.

Key Commitment 1

- All staff receive adequate training in child protection matters and have access to the setting's policy and procedures for reporting concerns of possible abuse and the safeguarding procedures of the Bromley Safeguarding Children Partnership.
- All staff understand that safeguarding is their responsibility.
- All staff receive adequate training in child protection matters and have access to the setting's policy and procedures for reporting concerns of possible abuse and the safeguarding procedures of Bromley Safeguarding Children Partnership.
- The Designated Safeguarding Lead receives weekly updated guidance from the NSPCC and ensures that policies and procedures are updated accordingly.
- The Designated Safeguarding Lead completes BSCP Safeguarding Audits to ensure all aspects of safeguarding are up to date within the setting. Any actions are followed up.
- All staff have adequate information on issues affecting vulnerability in families such as social exclusion, domestic violence, mental illness, substance misuse and parental learning disability, together with training that takes account of factors that affect children that arise from inequalities of race, gender, disability, language, religion, sexual orientation, or culture.
- All staff understand the principles of early help (as defined in Working Together to Safeguard Children, 2018 (Updated) and are able to identify those children and families who may be in need of early help and enable them to access it.

- All Staff understand BSCP thresholds of significant harm and understand how to access services for families, including for those families who are below the threshold for significant harm.
- All Staff understand their responsibilities under the General Data Protection Regulation and the Data Protection Act 2018, and understand relevant safeguarding legislation, statutory requirements and local safeguarding partner requirements and ensure that any information they may share about parents and their children with other agencies is shared appropriately and lawfully.
- All staff are confident to ask questions in relation to any safeguarding concerns, know not to just take things at face value but can be respectfully sceptical.
- All staff understand that not all the risks that children face will happen within Phoenix Early Learners and that they may be affected by, or may be exposed to harm in, different environments. This includes online environments. These experiences may also influence the way the children behave and live their lives in other situations. We try to remain vigilant about what might be happening in our local community.
- All staff understand our policy on promoting positive behaviour and follow it in relation to children showing aggression towards other children.
- All children have a key person to build a relationship with and are supported to articulate any worries, concerns or complaints that they may have in an age appropriate way.
- We use available curriculum materials for young children, taking account of information in the Early Years Foundation Stage, that enable children to be strong, resilient, and listened to and heard.
- All services seek to build the emotional and social skills of children and young people who are service users in an age-appropriate way, including increasing their understanding of how to stay safe.
- We adhere to the EYFS Safeguarding and Welfare requirements.

Key Commitment 2

- All staff are trained in line with the Criteria set out in Annex C of the EYFS (November 2025). Our training is provided through Bromley Early Years. Safeguarding training is refreshed at staff meetings and renewed every two years. The Designated Safeguarding Lead (DSL) ensures support, advice and guidance for all staff to meet their safeguarding responsibilities by regular 1:1 supervision, annual reviews and through reviewing safeguarding procedures together at staff meetings.
- There are procedures in place to prevent known abusers from coming into the organisation as employees or volunteers at any level.
- Safeguarding is the responsibility of every person undertaking the work of the organisation in any capacity.
- There are procedures for dealing with allegations of abuse against a member of staff, or any other person undertaking work whether paid or unpaid for the organisation, where there is an allegation of abuse or harm of a child. Procedures differentiate clearly between an allegation, a concern about quality of care or practice and complaints.
- There are procedures in place for reporting abuse of children or a young person in the setting.
- There are procedures in place for reporting safeguarding concerns where a child may meet the s17 definition of a child in need (Children Act 1989) and/or where a child may be at risk of significant harm,

and to enable staff to make decisions about appropriate referrals using local published threshold documents.

- There are procedures in place for reporting abuse of a vulnerable adult in the setting.
- There are procedures in place in relation to escalating concerns and professional challenge.
- There are procedures in place for working in partnership with agencies involving a child, or young person or vulnerable adult, for whom there is a protection plan in place. These procedures also take account of working with families with a 'child in need' and with families in need of early help, who are affected by issues of vulnerability such as social exclusion, radicalisation, domestic violence, mental illness, substance misuse and parental learning disability.
- These procedures take account of diversity and inclusion issues to promote equal treatment of children and their families and that take account of factors that affect children that arise from inequalities of race, gender, disability, language, religion, sexual orientation, or culture.
- There are procedures in place for record keeping, confidentiality and information sharing, which are in line with data protection requirements.
- We follow government and Bromley Safeguarding Children Partnership guidance in relation to extremism.
- The procedures of the Bromley Safeguarding Children Partnership must be followed.

Key Commitment 3

- We have a 'designated safeguarding lead (DSL)person', who is responsible for carrying out child, young person, or adult protection procedures.
- The DSL is responsible for overseeing all child, young person or adult protection matters.
- The DSL ensures they have links with statutory and voluntary organisations regarding safeguarding children.
- The DSL ensures they have received appropriate training on child protection matters and that all staff are adequately informed and/or trained to recognise child abuse in the categories of physical, emotional, and sexual abuse and neglect.
- The DSL ensures all staff are aware of the additional vulnerabilities that affect children that arise from inequalities of race, gender, disability, language, religion, sexual orientation, or culture and that these receive full consideration in child, young person, or adult protection related matters.
- The DSL ensures that staff are aware and receive training in social factors affecting children's vulnerability including:
  - social exclusion
  - domestic violence and controlling or coercive behaviour
  - mental Illness
  - drug and alcohol abuse (substance misuse)
  - parental/carer learning disability
  - radicalisation

- The DSL ensures that staff are aware and receive training in other ways that children may suffer significant harm and stay up to date with relevant contextual safeguarding matters:
  - abuse of disabled children
  - fabricated or induced illness
  - child abuse linked to spirit possession
  - sexually exploited children
  - children who are trafficked and/or exploited
  - female genital mutilation
  - extra-familial abuse and threats
  - children involved in violent offending, with gangs and county lines.

The DSL ensures they are adequately informed in vulnerable adult protection matters.

Key commitment 4

- There are procedures in place to ensure staff recognise children and families who may benefit from early help and can respond using local early help processes. DSLs should ensure all staff understand how to identify and respond to families who may need early help.
- Staff are supported to make the right decisions that enable timely and appropriate action to be taken.
- DSLs contribute towards local safeguarding arrangements to ensure that the views of the sector are heard at the highest level by:
  - Finding out how education and childcare are represented at a strategic level within Bromley Safeguarding Children Partnership
  - Sharing their knowledge of the experiences of children in their cohort with Bromley Safeguarding Children Partnership local leaders through forums.

Legal references

Primary legislation

Children Act 1989 – s 47
Protection of Children Act 1999
Care Act 2014
Children Act 2004 s11
Children and Social Work Act 2017
Safeguarding Vulnerable Groups Act 2006
Counter-Terrorism and Security Act 2015
General Data Protection Regulation 2018
Data Protection Act 2018
Modern Slavery Act 2015
Sexual Offences Act 2003
Serious Crime Act 2015
Criminal Justice and Court Services Act (2000)
Human Rights Act (1998)
Equalities Act (2006)
Equalities Act (2010)
Disability Discrimination Act (1995)
Data Protection Act (2018)
Freedom of Information Act (2000)
Working Together to Safeguard Children (HMG 2023)
Statutory Framework for the Early Years Foundation Stage 2026
What to Do if You're Worried a Child is Being Abused (HMG 2015)
Prevent duty guidance for England and Wales: guidance for specified authorities in England and Wales on the duty of schools and other providers in the Counter-Terrorism and Security Act 2015 to have due regard to the need to prevent people from being drawn into terrorism' (HMG 2015)
Keeping Children Safe in Education 2026
Early Years Inspection Handbook (Ofsted 2026)
The framework for the assessment of children in need and their families (DoH 2000)
Statutory guidance on inter-agency working to safeguard and promote the welfare of children (DfE 2015)

Further guidance

Information sharing advice for safeguarding practitioners (DfE 2024)
The Team Around the Child (TAC) and the Lead Professional (CWDC 2009)
The Common Assessment Framework (CAF) – guide for practitioners (CWDC 2010)
Multi-Agency Statutory Guidance on Female Genital Mutilation (HMG. 2016)
Multi-Agency Public Protection Arrangements (MAPPA) (Ministry of Justice, National Offender Management Service and HM Prison Service 2024)
Child Abuse Linked to Faith or Belief: National Action Plan (DfE 2012)
Safeguarding Children in whom Illness is Fabricated or Induced (HMG 2008)
Safeguarding Disabled Children: Practice Guidance (DfE 2009)
Safeguarding Children who may have been Trafficked (DfE and Home Office 2011)
Child sexual exploitation: definition and guide for practitioners (DfE 2017)
Handling Cases of Forced Marriage: Multi-Agency Practice Guidelines (HMG 2023)