Safeguarding and Child Protection Policy

Updated: 13 May 2026
Review Date: 13 May 2027

Important Contact Details

	Phone	Email
Designated Safeguarding Lead (DSL) – Francesca Paul	07842 392245	francescalouise_@hotmail.com
NSPCC Helpline	0808 800 5000	help@nspcc.org.uk
Kent County Council Social Services – Front Door	03000 41 11 11	frontdoor@kent.gov.uk
Out of Hours	03000 41 91 91	frontdoor@kent.gov.uk
Local Authority Designated Officer (LADO)	03000 41 08 88	LADO@kent.gov.uk
Whistleblowing Advice Line	0800 028 0285	help@nspcc.org.uk

Purpose and Scope

Nightingale Cottage is a small learning hub for home-educated pupils, open three days a week in Shipbourne. We also facilitate afternoon clubs from 2 pm led by external practitioners.

This policy aims to:

- Protect children who receive Nightingale Cottage's services from harm.
- Provide clear safeguarding principles and procedures for staff, volunteers, and external practitioners.
- Ensure we always act in the child's best interests and maintain an attitude of *"it could happen here."*

Legal Framework

This policy draws upon the following key legislation and guidance:

- Keeping Children Safe in Education (KCSiE) 2024
- After-school clubs, community activities, and tuition 2026
- Working Together to Safeguard Children 2023

- Children Acts 1989 and 2004
- The Prevent Duty Guidance 2015
- Data Protection Act 2018
- Sexual Offences Act 2003

A summary is available at nspcc.org.uk.

Principles

We believe that every child deserves protection from abuse and neglect.
We recognise that:

- The welfare of children is paramount.
- Partnership with parents, carers, and other agencies promotes wellbeing.
- All children, regardless of background or identity, have equal rights to safety and protection.
- Some children are more vulnerable and need additional safeguards.

We keep children safe by:

- Listening to and valuing them.
- Maintaining safe environments and clear behaviour expectations.
- Appointing a trained Designated Safeguarding Lead, refreshed every two years.
- Ensuring up-to-date DBS checks and safeguarding induction for all staff and external practitioners.
- Recording and storing information professionally and securely.
- Sharing concerns appropriately with agencies that need to know.
- Managing allegations and complaints effectively.
- Promoting respect and openness within our community.

Identifying and Responding to Concerns

Any safeguarding or welfare concerns will be reported to
Kent County Council Social Services (Front Door).
If a child is in immediate danger, the police must be called on 999.

Disclosures

Children may disclose abuse directly, indirectly, behaviourally, or non-verbally. All disclosures must be taken seriously, recorded factually, and reported to the DSL without delay.

Spotting the Signs

Staff and practitioners are trained to recognise indicators of abuse. The DSL receives annual refresher training and ensures others do the same or at least are briefed on current guidance.

Responding to a Disclosure

If a child tells you something:

1. Listen carefully and take them seriously.
2. Do not ask leading questions or show bias.
3. Reassure them they've done the right thing.
4. Explain that the information must be shared to keep them safe.
5. Report to the DSL immediately and record the conversation that same day.
6. If there is a risk of immediate harm, anyone may make a direct referral to Children's Services or the police.

The DSL will decide on next steps, including contact with family or referral to social care. Never approach or question an alleged perpetrator.

Allegations Involving Children ("Child-on-Child" Abuse)

Concerns such as bullying, sexualised behaviour, or physical aggression between children will be recorded and reviewed by the DSL.

An incident becomes a *child-protection concern* when:

- It involves sexual or physical assault, coercion, or a power imbalance (e.g. age, size, vulnerability, or authority).
- The behaviour causes, or risks, significant harm.

Immediate danger → call 999.

Otherwise, record and inform the DSL for action.

Allegations Against Adults

Any allegation or concern about staff, volunteers, or external practitioners must be reported to the DSL.

Where the concern suggests that the individual:

1. Has harmed or may harm a child,
2. May have committed an offence against a child, or
3. Has behaved in a way that makes them unsuitable to work with children,

the DSL must contact the LADO the same day for advice and next steps.

The DSL will keep written, confidential records of all discussions and decisions.

External Practitioners and Other Adults on Site

One of our key aims is to give children exposure to unique learning experiences. To do so, we invite external practitioners to deliver sessions.

Ad-hoc Visitors (Supervised)

Adults who visit for a single day or afternoon and are never left unsupervised with children do not require an Enhanced DBS check but will be supervised at all times by Nightingale Cottage staff.

External Practitioners (Supervised and Unsupervised Clubs / Workshops)

Nightingale Cottage engages external practitioners to lead or support clubs, workshops, and activities. The level of safeguarding requirements depends on whether the practitioner will be supervised or unsupervised while working with children.

External practitioners leading clubs from 2 pm onward will usually work unsupervised and are therefore engaging in regulated activity. In these cases, they are subject to the following safer recruitment process.

Requirements for Unsupervised External Practitioners (Regulated Activity)

All unsupervised external practitioners **must** provide the following **before** any unsupervised contact with children begins:

- A valid Enhanced DBS certificate with children's barred list information, issued within the last 3 years.
- Registration with the DBS Update Service (strongly preferred). If not registered, a new Enhanced DBS check must be obtained at least every 3 years or sooner if required.
- Sign to say the have read and understood this Safeguarding and Child Protection Policy and the Code of Conduct for Adults.
- Sign a written agreement / contract that clearly sets out safeguarding responsibilities, terms of engagement, and insurance arrangements.
- Hold an appropriate emergency first aid qualification if working alone on site without immediate access to a Nightingale Cottage first aider.
- Hold appropriate public liability and professional indemnity insurance (if not fully covered under Nightingale Cottage's insurance policy – confirmation must be obtained in advance from our insurer).

They must also:

- Maintain clear and open communication with the Designated Safeguarding Lead (DSL).
- Report any safeguarding concerns **immediately** to the DSL.
- Comply fully with Nightingale Cottage's safeguarding procedures at all times.

Requirements for Supervised External Practitioners (Non-Regulated Activity)

For external practitioners who will **always remain under direct supervision** by a member of Nightingale Cottage staff:

- A basic or Enhanced DBS check is preferred (but not always mandatory if supervision is constant).
- Identity and right to work checks are still required.
- A simplified Safeguarding Declaration must be completed.
- They must read and agree to follow this policy and the Adult Code for Conduct.
- Close supervision must be maintained at all times.

General Requirements (All External Practitioners)

- All original documents will be verified in person.
- All checks will be recorded on our Single Central Record (SCR).

- No external practitioner will be allowed unsupervised contact with children until all required checks have been satisfactorily completed and verified.
- The setting reserves the right to refuse or terminate any arrangement if safeguarding assurances are considered insufficient

The Prevent Duty

We are committed to protecting children from the risk of radicalisation or exposure to extremist ideas.
We will:

- Stay alert to changes in children's behaviour or attitudes.
- Contact police on 999 if extremist or violent intent is suspected.
- Refer concerns to the Kent and Medway Prevent Coordinator where appropriate.

Online Safety

Children's internet use is minimal. Where we do use it (e.g. a laptop for research), children are always supervised. All devices use appropriate filters (e.g. via Chrome or Safari settings). We promote safe, open discussions about responsible technology use.

Children may not bring personal mobile phones, smartwatches, or similar devices.

Photography and Images

Parental consent for photography and image sharing is obtained via the Registration & Consent Form.

Staff may use personal phones but are asked to delete photographs permanently when finished. Images are used only in line with agreed permissions and safeguarding standards.

Adult-to-Child Ratios

We maintain a ratio of one adult to eight children aged eight and over, although our ratios are often much higher than this. Staffing levels are reviewed in light of the age and number of children, the activities undertaken and any identified risks, with additional adults provided where necessary.

A qualified teacher leads each day and is responsible for the supervision of the children in their care. The Designated Safeguarding Lead (DSL) will always remain on site throughout sessions and will be available to provide support in the event of an incident, emergency or situation requiring additional assistance.

Staffing arrangements and supervision are reviewed through risk assessment to ensure the safety and wellbeing of all children.

Code of Conduct

For Children

Our behaviour policy sets clear expectations, agreed by children and parents when they enrol.

For Adults

All staff, volunteers, and external practitioners act in positions of trust. They are expected to model respectful behaviour, maintain professional boundaries, and report any behaviour by others that could compromise children's safety, as outlined in our Code of Conduct for Adults Working with Children.

Complaints

Families are encouraged to share feedback openly.
Complaints may be made verbally or in writing and will be logged with dates, details, and outcomes.
Responses will be given within 28 days, and records retained for three years.
(See our separate *Complaints Policy* for details.)

Safer Recruitment Policy

Recruitment and suitability of staff

Nightingale Cottage is committed to ensuring that all adults working with children are suitable to do so and that robust safer-recruitment procedures are followed.

The same principles apply regardless of whether an individual is employed, self-employed or engaged on a freelance basis.

Before an individual begins working with children, Nightingale Cottage will:

- verify their identity;
- verify their right to work in the UK, where applicable;
- obtain and check appropriate references, normally including a reference from their most recent employer or relevant professional role;
- verify relevant qualifications and professional experience;
- obtain the appropriate level of Disclosure and Barring Service (DBS) check for the role. Where an individual is undertaking regulated activity with children, the appropriate Enhanced DBS check with Children's Barred List check will be obtained;
- undertake an overseas criminal-record check or other appropriate additional checks where an individual has lived or worked overseas;
- where relevant, check that the individual is not subject to a teacher prohibition order;
- where relevant, consider whether any other prohibition, restriction or disqualification applies to the individual's role;
- assess the individual's suitability to work with children through the overall recruitment process rather than relying on DBS information alone.

References will be obtained directly from the referee wherever possible and will be checked for consistency with the individual's application, employment history and qualifications. Any concerns or unexplained gaps will be followed up before the individual begins working with children.

Nightingale Cottage recognises that a DBS certificate provides a snapshot of information available at the time of the check and does not, by itself, demonstrate that an individual remains suitable to work with children. Staff are therefore expected to notify the setting of any relevant change in circumstances, including any criminal investigation, charge, caution, conviction or other matter which may affect their suitability.

Regulated activity

Nightingale Cottage will determine whether an individual's role constitutes regulated activity with children and will obtain the level of DBS check for which that individual is legally eligible.

Where a member of staff undertakes teaching, training, instruction or supervision of children without supervision and does so frequently enough to meet the relevant regulated-activity criteria, they may be undertaking regulated activity and will require an Enhanced DBS check with a Children's Barred List check.

Where an individual is not undertaking regulated activity, Nightingale Cottage will nevertheless obtain an appropriate DBS check where the role is eligible and will use safer-recruitment measures including references, identity checks, qualification checks and assessment of suitability.

Teacher prohibition checks

As Nightingale Cottage engages qualified teachers to work directly with children, teacher prohibition checks will be undertaken where relevant. This provides an additional safeguard to establish that a teacher is not prohibited from teaching in England.

A prohibition check will not replace the required DBS check or other safer-recruitment checks.

Staff from overseas

Where an applicant has lived or worked outside the UK, Nightingale Cottage will seek appropriate criminal-record information or other relevant safeguarding information from the countries concerned, where available. Overseas checks will be considered alongside UK DBS checks and references.

Ongoing suitability

Suitability is considered an ongoing responsibility rather than a one-off recruitment exercise. Staff performance, conduct and safeguarding practice will be monitored, and concerns will be addressed promptly.

All staff are expected to follow the Nightingale Cottage safeguarding and staff behaviour policies. Any concern about the conduct or suitability of a member of staff will be taken seriously and managed in accordance with the setting's safeguarding procedures, including referral to the Local Authority Designated Officer (LADO) or other relevant agencies where appropriate.

A record of recruitment and suitability checks will be maintained in the setting's Single Central Record (SCR).

Records Retention and Storage

Child Protection Records

- Each child has a separate, secure safeguarding file.
- Records are factual, dated, and signed.
- Retained until the child's 25th birthday, unless transferred to another setting.
- Access limited to the DSL and designated safeguarding personnel.

Adult Concerns Records

- Detailed logs are kept for all allegations or concerns about adults (staff, volunteers, or external practitioners).
- Stored securely in the individual's personnel file, not a central log.
- Retained for ten years or until normal pension age, whichever is longer.
- Destroyed if the allegation is proven false.
- Accessible only to the DSL or safeguarding lead.

Safer Recruitment and Vetting Records

- The Single Central Record documents all identity, qualification, and DBS checks.
- Personnel files hold copies of ID, references and signed declarations.
- Recruitment documentation retained for the duration of engagement + six years, unless required longer by law.
- All records held in accordance with the UK Data Protection Act 2018.

Whistleblowing

Staff, volunteers, and practitioners who are concerned about how safeguarding issues have been handled can contact:

- The NSPCC Whistleblowing Advice Line – 0800 028 0285 | help@nspcc.org.uk

This includes situations where:

- Procedures seem unclear or have not been followed.
- Concerns have been ignored or covered up.
- A previous report hasn't been acted upon.
- The reporter fears unfair treatment.

Monitoring and Review

This policy is reviewed annually or earlier if:

- There are changes in relevant legislation or DfE guidance (e.g., updates to *KCSiE* or *Working Together*), or
- Local or national safeguarding reviews highlight new learning.

All revisions are shared with staff, volunteers, external practitioners, and parents.

Approved by: Francesca Paul, Designated Safeguarding Lead
Date: 19 October 2026