

## 2.0 Child Protection and Safeguarding Policy

**Designated safeguarding lead:** HELEN REES

**Deputy Designated Safeguarding Leads:** NICKY CHANTLER & KATIE BEDFORD

**Designated officer:** GENEFER ESPEJO (Committee Member & Cheam Baptist Church Trustee)

Designated Safeguarding Leads for Cheam Baptist Church: LIZ BRAILSFORD

*KCSIE (Keeping Children Safe in Education) (2024), paragraph 3 defines Safeguarding and promoting the welfare of children as:*

- *protecting children from maltreatment.*
- *preventing impairment of children’s mental and physical health or development.*
- *ensuring that children grow up in circumstances consistent with the provision of safe and effective care and*
- *taking action to enable all children to have the best outcomes.*

### **Aim**

Cheam Baptist Church Pre-school is committed to safeguarding children and will work with children, parents and the community to ensure that the rights and safety of children, young people\* and vulnerable adults\*\* are at the heart of all our activities and practice.

Our Child Protection and Safeguarding policy is based on three key commitments against which policies and procedures will be drawn to provide a coherent and consistent safeguarding strategy. The three commitments are as follows:

#### **Key commitment 1**

Cheam Baptist Church Pre-school is committed to building ‘a culture of safety’ in which children, young people and vulnerable adults are protected from abuse and harm in all areas of our service delivery.

#### **Key commitment 2**

Cheam Baptist Church Pre-school is committed to responding promptly and appropriately to all incidents or concerns of abuse that may occur and to work with statutory agencies in accordance with the procedures that are set down in ‘*What to do if you are worried a child is being abused*’ (HMG 2015) and ‘*No Secrets*’ (updated by the Care Act 2014) and *Working Together to Safeguard Children 2018*.

#### **Key commitment 3**

Cheam Baptist Church Pre-school is committed to promoting awareness of child abuse issues throughout its training and learning programmes for adults. It is also committed to empowering children, young people, and vulnerable adults, through its curriculum, promoting their right to be ‘*strong, resilient and listened to*’.

\* A ‘young person’ is defined as 16–19-year-old. In our setting, they may be a student, worker, volunteer or parent.

\*\* A ‘vulnerable adult’ (see guidance to the Care Act 2014) as: ‘a person aged 18 years or over, who is in receipt of or may need community care services by reason of ‘mental or other disability, age or illness and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation’. In our setting,

*this person may be a service user, parent of a service user, or a volunteer.*

## Key Commitment 1

***Cheam Baptist Church Pre-school is committed to building 'a culture of safety' in which children, young people and vulnerable adults are protected from abuse and harm in all areas of our service delivery.***

- We have a 'Designated Safeguarding Lead person' (DSL), and at least one 'Designated Safeguarding Lead deputy' who are responsible for carrying out child, young person, or adult protection procedures at Cheam Baptist Church Pre-school. Cheam Baptist Church also has a Designated Safeguarding Lead and a Designated Safeguarding Lead Deputy.
- The Designated Safeguarding Lead reports to a 'Designated Officer' responsible for overseeing all child, young person or adult protection matters. This is a member of Cheam Baptist Church Pre-school Committee.

### **The DSL and deputies ensure that:**

- They have links with statutory and voluntary organisations regarding safeguarding children including Sutton Local Safeguarding Children Partnership (LSCP).
- They have received appropriate training on child protection matters every two years and refresh their knowledge at least annually.
- All staff are trained to understand our child protection and safeguarding policies and procedures, and parents are made aware of them too.
- All staff have an up-to-date knowledge of child protection matters and are adequately informed and/or trained to recognise possible child abuse in the categories of physical, emotional and sexual abuse and neglect. They understand their professional duty to ensure safeguarding and child protection concerns are reported to the DSL or deputies. They receive safeguarding training **every 2 years** and updates on safeguarding at least annually. In addition to this, staff are given refresher training as the need arises.
- All staff take all welfare concerns seriously and encourage children and young people to talk to us about anything that worries them. We will always act in the best interest of the child. Staff share any concerns they have about a child with the DSL. However, it should be remembered 'that sometimes children will not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful...This should not prevent staff from having a professional curiosity and [sharing with] the DSL'.
- All staff are aware of the additional vulnerabilities that may affect children arising from any 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.
- All staff are aware of 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 learning disability
  - radicalisation
- All staff are aware of 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 belief in 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, deputies and the Designated Officer ensure they are adequately informed in vulnerable adult protection matters.

## Key Commitment 2

***Cheam Baptist Church Pre-school is committed to responding promptly and appropriately to all incidents or concerns of abuse that may occur and to work with statutory agencies in accordance with the procedures that are set down in 'What to do if you are worried a child is being abused' (HMG 2015) and 'No Secrets' (updated by the Care Act 2014) and Working Together to Safeguard Children 2018.***

- 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 Cheam Baptist Church Pre-school, 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 Cheam Baptist Church Pre-school, 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 possible 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 to ensure staff recognise children and families who may benefit from early help and can respond appropriately using Sutton Local Safeguarding Children Partnership (LSCP) processes. The DSL and deputies ensure all staff understand how to identify and respond to families who may need early help.
- There are procedures in place for reporting possible abuse of a vulnerable adult in the setting.
- There are procedures in place in relation to escalating concerns with Sutton LSCP.
- 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.
- In relation to radicalisation and extremism, we follow the Prevent Duty guidance for England and Wales published by the Home Office and LSCP procedures on responding to radicalisation.
- We follow Sutton LSCP procedures.

### **Key Commitment 3**

***Cheam Baptist Pre-school is committed to promoting awareness of child abuse issues throughout its training and learning programmes for adults. It is also committed to empowering children, young people, and vulnerable adults, through its curriculum, promoting their right to be 'strong, resilient and listened to'.***

- 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 Sutton LSCP.
- 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.
- We use available curriculum materials for young children, taking account of information in the Early Years Foundation Stage, to introduce key elements of keeping children safe into our programme to promote the personal, social and emotional development of all children, so that they may grow to be *strong, resilient and listened to* and so that they develop an understanding of why and how to keep safe.
- We adhere to the EYFS Safeguarding and Welfare requirements.

## **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)

### **Legal references**

Working Together to Safeguard Children (HMG 2018)  
Statutory Framework for the Early Years Foundation Stage 2023  
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 2024  
Education Inspection Framework (Ofsted 2023)  
The framework for the assessment of children in need and their families (DoH 2000)  
The Common Assessment Framework (2006)  
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 2018)  
The Team Around the Child (TAC) and the Lead Professional (CWDC 2009)  
The Common Assessment Framework (CAF) – guide for practitioners (CWDC 2010)  
The Common Assessment Framework (CAF) – guide for managers (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 2014)  
Safeguarding Children from Abuse Linked to a Belief in Spirit Possession (HMG 200)  
Safeguarding Children in whom Illness is Fabricated or Induced (HMG 2007)  
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 2014)

## 2.1 Responding to Child Protection and Safeguarding Concerns

**Designated safeguarding lead:** HELEN REES

**Deputy Designated Safeguarding Leads:** NICKY CHANTLER & KATIE BEDFORD

**Designated officer:** GENEFER ESPEJO

### Safeguarding roles

- All staff recognise and know how to respond to signs and symptoms that may indicate a child is suffering from or likely to be suffering from harm. They understand that they have a responsibility to act immediately by discussing their concerns with the Designated Safeguarding Lead (DSL) or Deputy Designated Safeguarding Lead.
- The Manager and Deputy are the DSL and Deputy DSL, responsible for co-ordinating action taken by the setting to safeguard vulnerable children and adults.
- All concerns about the welfare of children in the setting should be reported to the DSL or the Deputy DSLs.
- The DSL and deputies ensure that all educators are alert to the indicators of abuse and neglect and understand how to identify and respond to these.
- The setting should not operate without an identified DSL at any time.
- The line manager of the DSL is the Designated Officer.
- The DSL informs the Designated Officer about serious concerns as soon as they arise and agree the action to be taken, seeking further clarification if there are any doubts that the issue is safeguarding.
- If it is not possible to contact the Designated Officer, action to safeguard the child is taken first and the Designated Officer is informed later. Any referrals being made to Children's First Contact Service (CFCS), or where appropriate the Local Authority Designated Officer (LADO), Ofsted or Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) should not be delayed.
- Issues which may require notifying to Ofsted are notified to the Designated Officer for them to make a decision regarding notification. The DSL must remain up to date with Ofsted reporting and notification requirements.
- If there is an incident, which may require reporting to RIDDOR the Designated Officer immediately seeks guidance from the Trustees. There continues to be a requirement that the Designated Officer follows legislative requirements in relation to reporting to RIDDOR. This is fully addressed in section 01 Health and Safety procedures.

- We follow procedures of Sutton Local Safeguarding Children Partnership (LSCP) for safeguarding and any specific safeguarding procedures such as responding to radicalisation/extremism concerns. Procedures are followed for managing allegations against staff, as well as for responding to concerns and complaints raised about quality or practice issues, whistleblowing and escalation.

### **Responding to marks or injuries observed**

- If a member of staff observes or is informed by a parent/carer of a mark or injury to a child that happened at home or elsewhere, the member of staff makes a record of the information given to them on a 'Reported Accidents/Incidents Outside Pre-school' form which is signed by the parent/carer and kept securely in the child's personal file. The DSL/Deputy is informed, and it is also recorded on the 'Reported Accidents/Incidents Outside Pre-school Summary Sheet.'
- If the mark or injury is noticed later in the day and the parent is not present, the member of staff makes a record on the 'Reported Accidents/Incidents Outside Pre-school' form and shares it with the DSL/Deputy, who discusses it with the parent at the end of the session. The form is then signed by the parent/carer and kept securely in the child's file. It is also recorded on the 'Reported Accidents/Incidents Outside Pre-school Summary Sheet.'
- If it is unclear whether an injury occurred at the Pre-school or outside and the child is unable to say, this is raised with the DSL/Deputy, a record is made in the 'Accident book', with a note that the circumstances of the injury are not known. This is then discussed with the parent/carer at the end of the session.
- The member of staff advises the DSL/Deputy as soon as possible if there are safeguarding concerns about the circumstance of the injury.
- If there are concerns about the circumstances or explanation given, by the parent/carer and/or child, the DSL/Deputy decides the course of action to be taken and a 'Safeguarding Incident Reporting' form will be completed.

### **Responding to signs and symptoms of abuse**

- Concerns about the welfare of a child are discussed with the DSL/Deputy without delay.
- A written record of the concern is made on a 'Safeguarding Incident Reporting' form as soon as possible.
- Concerns that a child is in immediate danger or at risk of significant harm are responded to immediately and if a referral is necessary this is made on the same working day.

### **Responding to a disclosure by a child**

- When responding to a disclosure from a child, the aim is to get just enough information to take appropriate action.
- The educator listens carefully and calmly, allowing the child time to express what they want to say.

- Staff do not attempt to question the child but if they are not sure what the child said, or what they meant, they may prompt the child further by saying *'tell me more about that'* or *'show me again'*.
- After the initial disclosure, staff speak immediately to the DSL/Deputy. They do not further question or attempt to interview a child.
- If a child shows visible signs of abuse such as bruising or injury to any part of the body and it is age appropriate to do so, the key person/DSL will ask the child how it happened.
- When recording a child's disclosure on the 'Safeguarding Incident Reporting' form, their exact words are used as well as the exact words with which the member of staff responded.
- If marks or injuries are observed, these are recorded on a body diagram.

### **Decision making (all categories of abuse)**

- The DSL/Deputy makes a professional judgement about referring to other agencies, including Children's First Contact Service, using Sutton LSCP Threshold Guidance, found at [www.suttonlscp.org.uk](http://www.suttonlscp.org.uk):
  - Tier 1 – No additional needs
  - Tier 2 – Children with additional needs
  - Tier 3 – Children with complex multiple needs
  - Tier 4 – Children in acute need
- Staff are alert to indicators that a family may benefit from early help services and should discuss this with the DSL/Deputy, also completing a 'Safeguarding Incident Reporting' form if they have not already done so.

### **Seeking consent from parents/carers to share information before making a referral for early help (Early Help Assessment Toolkit) (Tier 2/3\*)**

Parents are made aware of the setting's Privacy Notice/Data Protection Policy which explains the circumstances under which information about their child will be shared with other agencies. When a referral for early help is necessary, the DSL/Deputy must always seek consent from the child's parents to share information with the relevant agency.

- If consent is sought and withheld and there are concerns that a child may become at risk of significant harm without early intervention, there may be sufficient grounds to over-ride a parental decision to withhold consent.
- If a parent withholds consent, this information is included on any referral that is made to the local authority. In these circumstances a parent should still be told that the referral is being made beforehand (unless to do so may place a child at risk of harm).
- The Sutton LSCP Threshold Guidance Appendix B: Information Sharing will be considered.

*\*Tier 2: Children with additional needs, who may be vulnerable and showing early signs of abuse*



*and/or neglect; their needs are not clear, not known or not being met. Tier 3: Children with complex multiple needs, requiring specialist services in order to achieve or maintain a satisfactory level of health or development or to prevent significant impairment of their health and development and/or who are disabled.*

### **Informing parents when making a child protection referral**

In most circumstances consent will not be required to make a child protection referral, because even if consent is refused, there is still a professional duty to act upon concerns and make a referral. When a child protection referral has been made, the DSL/Deputy contacts the parents (only if agreed with CFCS) to inform them that a referral has been made, indicating the concerns that have been raised, unless CFCS advises that the parent should not be contacted until such time as their investigation, or the police investigation, is concluded. Parents are not informed prior to making a referral if:

- there is a possibility that a child may be put at risk of harm by discussion with a parent/carer, or if a serious offence may have been committed, as it is important that any potential police investigation is not jeopardised.
- there are potential concerns about sexual abuse, fabricated illness, FGM or forced marriage.
- contacting the parent puts another person at risk; situations where one parent may be at risk of harm, e.g. abuse; situations where it has not been possible to contact parents to seek their consent may cause delay to the referral being made

The DSL/Deputy makes a professional judgment regarding whether consent (from a parent) should be sought before making a child protection referral as described above. They record their decision about informing or not informing parents along with an explanation for this decision. Advice will be sought from CFCS if there is any doubt. Advice can also be sought from the Designated Officer.

### **Referring**

- The DSL/Deputy follows Sutton LSCP procedures for making a referral. Referrals are made to the Children's First Contact Service (CFCS). An electronic form for referral can be accessed through the Sutton CFCS website. Guidelines set out by CFCS are followed for the referral process.
- If the DSL/Deputies are not on site, one of them will always be allocated to be contactable. They will either make the referral or assist the most senior member of staff present in doing so.
- If a child is believed to be in immediate danger, or an incident occurs at the end of the session and staff are concerned about the child going home that day, then the Police and CFCS are contacted immediately. This will be the responsibility of the most senior member of staff and the allocated DSL/deputy will be contacted immediately if not on site.
- If the child is 'safe' because they are still in the setting, and there is time to do so, the senior member of staff contacts the Designated Officer for support.

### **Further recording**

- Information is recorded using the 'Safeguarding Incident Reporting' form, and a short summary entered on a 'Child Welfare and Protection Summary' form. Discussion with parents and any further discussion with CFCS is recorded. If recording a conversation with parents that is

significant, regarding the incident or a related issue, parents are asked to sign and date a record of the conversation. It should be clearly recorded what action was taken, what the outcome was and any follow-up.

- If a referral was made, copies of all documents are kept and stored securely and confidentially (including copies in the child's safeguarding file).
- Each member of staff/volunteer who has witnessed an incident or disclosure should also make a written statement on a 'Safeguarding Incident Reporting' form, as above.
- The referral is recorded on a 'Child Welfare and Protection Summary' form.
- Follow up phone calls to or from CFCS are recorded in the child's file; with date, time, the name of the social care worker and what was said.
- Safeguarding records are kept up to date and made available for confidential access by the Designated Officer.

### **Reporting a serious child protection incident using 'Confidential Safeguarding Incident Report' form**

- The DSL is responsible for reporting to the Designated Officer and seeking advice if required, prior to making a referral as described above.
- For child protection concerns at Tier 3 and 4\*\* it will be necessary for the DSL to complete 'Confidential Safeguarding Incident Report' form and send it to the Designated Officer.
- Further briefings are sent to the Designated Officer when updates are received until the issue is concluded.

\*\* Tier 3: Children with complex multiple needs, requiring specialist services in order to achieve or maintain a satisfactory level of health or development or to prevent significant impairment of their health and development and/or who are disabled. Tier 4: Children in acute need, who are suffering or are likely to suffer significant harm.

### **Professional disagreement/escalation process**

- If an educator disagrees with a decision made by the DSL/Deputy not to make a referral to CFCS they must initially discuss and try to resolve it with them.
- If the disagreement cannot be resolved with the DSL/Deputy and the educator continues to feel a safeguarding referral is required, then they discuss this with the Designated Officer.
- If issues cannot be resolved, the Whistle-blowing policy should be used.
- If we feel that a referral made has not been dealt with properly or that concerns are not being addressed or responded to, we will follow the Sutton LSCP escalation process.

### **Female genital mutilation (FGM)**

Practitioners should be alert to symptoms that would indicate that FGM has occurred, or may be

about to occur, and take appropriate safeguarding action. The DSL/Deputy should contact the police immediately as well as refer to Sutton CFCS if they believe that FGM may be about to occur.

It is illegal to undertake FGM or to assist anyone to enable them to practice FGM under the Female Genital Mutilation Act 2003, it is an offence for a UK national or permanent UK resident to perform FGM in the UK or overseas. The practice is medically unnecessary and poses serious health risks to girls. FGM is mostly carried out on girls between the ages of 0-15, statistics indicate that in half of countries who practise FGM girls were cut before the age of 5. Sutton LSCP guidance must be followed in relation to FGM, and the DSL/Deputy is informed regarding specific risks relating to the culture and ethnicity of children who may be attending their setting and shares this knowledge with staff.

Symptoms of FGM in very young girls may include difficulty walking, sitting or standing; painful urination and/or urinary tract infection; urinary retention; evidence of surgery; changes to nappy changing or toileting routines; injury to adjacent tissues; spends longer than normal in the bathroom or toilet; unusual and /or changed behaviour after an absence from the setting (including increased anxiety around adults or unwillingness to talk about home experiences or family holidays); parents are reluctant to allow child to undergo normal medical examinations; if an older sibling has undergone the procedure a younger sibling may be at risk; discussion about plans for an extended family holiday.

#### **Further guidance**

NSPCC 24-hour FGM helpline: 0800 028 3550 or email [fgmhelp@nspcc.org.uk](mailto:fgmhelp@nspcc.org.uk)

Government help and advice: [www.gov.uk/female-genital-mutilation](http://www.gov.uk/female-genital-mutilation)

#### **Children and young people vulnerable to extremism or radicalisation**

Early years settings, schools and local authorities have a duty to identify and respond appropriately to concerns of any child or adult at risk of being drawn into terrorism. Sutton LSCP has procedures which cover how professionals should respond to concerns that children or young people may be at risk of being influenced by or being made vulnerable by the risks of extremism.

There are potential safeguarding implications for children and young people who have close or extended family or friendship networks linked to involvement in extremism or terrorism.

- The DSL/Deputies are required to familiarise themselves with Sutton LSCP procedures, as well as online guidance including:
  - Channel Duty guidance: Protecting people vulnerable to being drawn into terrorism [www.gov.uk/government/publications/channel-and-prevent-multi-agency-panel-pmap-guidance](http://www.gov.uk/government/publications/channel-and-prevent-multi-agency-panel-pmap-guidance)
  - Prevent Strategy (HMG 2011) [www.gov.uk/government/publications/prevent-strategy-2011](http://www.gov.uk/government/publications/prevent-strategy-2011)
- The prevent duty: for schools and childcare providers [www.gov.uk/government/publications/protecting-children-from-radicalisation-the-prevent-duty](http://www.gov.uk/government/publications/protecting-children-from-radicalisation-the-prevent-duty)
- The DSL & Deputies follow Sutton LSCP guidance in relation to how to respond to concerns regarding extremism and will complete local training where appropriate.

- The DSLs ensure that staff know how to identify and raise any concerns in relation to this with them. The DSL ensures that all staff complete online Prevent Duty Awareness Course.
- The DSL/Deputies know how to refer concerns about risks of extremism/radicalisation to Sutton LSCP or the Channel panel, as appropriate. They will complete the online Prevent Duty Referrals Course.
- The DSL/Deputy ensures that they and all other staff working with children and young people understand how to recognise that someone may be at risk of violent extremism.
- The DSL/Deputy seeks to understand the perceived terrorism risks in relation to the area that they deliver services in.

### **Parental consent for radicalisation referrals**

Sutton LSCP procedures are followed in relation to whether parental consent is necessary prior to making a referral about a concern that a child or adult may be at risk of being drawn into terrorism. It is good practice to seek the consent of the person, or for very young children, the consent of their parent/carer prior to making a referral, but it is not a requirement to seek consent before referring a concern regarding possible involvement in extremism or terrorism if it may put a child at risk, or if an offence may have been or may be committed. Advice should be sought from line managers and local agencies responsible for safeguarding, as to whether, or not consent should be sought on a case-by-case basis. DSL/Deputies are mindful that discussion regarding potential referral due to concerns may be upsetting for the subject of the referral and their family. Initial advice regarding whether an incident meets a threshold for referral can be sought from the relevant local agency without specific details such as names of the family being given in certain circumstances.

Consent is required prior to any individual engaging with a Channel intervention. Consent is usually sought by Channel partners, but Sutton LSCP procedures should be followed regarding this.

If there is a concern that a person is already involved in terrorist activity this must be reported to the Anti-Terrorist Hot Line 0800 789 321-Text/phone 0800 0324 539. Police can be contacted on 101.

### **Concerns about children affected by gang activity/serious youth violence**

Educators are aware that children can be put at risk by gang activity, both through participation in and as victims of gang violence. Whilst very young children will be very unlikely to become involved in gang activity they may potentially be put at risk by the involvement of others in their household in gangs, such as an adult sibling or a parent/carer. DSL/Deputies are familiar with Sutton LSCP guidance and procedures in relation to safeguarding children affected by gang activity and ensure this is followed where relevant.

### **Forced marriage/Honour based violence**

Forced marriage is a marriage in which one or both spouses do not consent to the marriage but are forced into it. Duress can include physical, psychological, financial, sexual and emotional pressure. In the cases of some vulnerable adults who lack the capacity to consent coercion is not required for a marriage to be forced. A forced marriage is distinct from an arranged marriage. An arranged marriage may have family involvement in arranging the marriages, but crucially the choice of whether to accept the arrangement remains with the prospective spouses.

Forced marriage became criminalised in 2014. There are also civil powers for example a Forced

Marriage Protection Order to protect both children and adults at risk of forced marriage and offers protection for those who have already been forced into marriage.

Risks in relation to forced marriage are high and it is important that educators ensure that anyone at risk of forced marriage is not put in further danger. If someone is believed to be at risk it is helpful to get as much practical information as possible, bearing in mind the need for absolute discretion, information that can be helpful will include things like, names, addresses, passport numbers, national insurance numbers, details of travel arrangements, dates and location of any proposed wedding, names and dates of birth of prospective spouses, details of where and with whom they may be staying etc. Forced marriage can be linked to honour-based violence, which includes assault, imprisonment and murder. Honour based violence can be used to punish an individual for undermining what the family or community believes to be the correct code of behaviour.

In an emergency police should be contacted on 999.

Forced Marriage Unit can be contacted either by professionals or by potential victims seeking advice in relation to their concerns. The contact details are below.

- Telephone: +44 (0) 20 7008 0151
- Email: [fmufco.gov.uk](mailto:fmufco.gov.uk)
- Email for outreach work: [fmoutrreach@fco.gov.uk](mailto:fmoutrreach@fco.gov.uk)

### **Further guidance**

Multi-agency practice guidelines: Handling cases of Forced Marriage (HMG 2014)  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/322307/HMG MULTI AGENCY PRACTICE GUIDELINES v1 180614 FINAL.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/322307/HMG_MULTI_AGENCY_PRACTICE_GUIDELINES_v1_180614_FINAL.pdf)

### **Contact details**

- CFCS Sutton Telephone: 020 8770 6001 (main number)

Out of Hours 0208 770 5000

Email: [Childrensfirstcontactservice@sutton.gov.uk](mailto:Childrensfirstcontactservice@sutton.gov.uk)

Education Safeguarding Manager Cognus [hayley.cameron@cognus.org.uk](mailto:hayley.cameron@cognus.org.uk)

Education E-safety Adviser Cognus [stephen.welding@cognus.org.uk](mailto:stephen.welding@cognus.org.uk)

Education Safeguarding Children Adviser, Education Lead in the MASH (Multi-Agency Safeguarding Hub) Cognus [gillian.bush@cognus.org.uk](mailto:gillian.bush@cognus.org.uk)

Outdoor Education Adviser [mick.bradshaw@cognus.org.uk](mailto:mick.bradshaw@cognus.org.uk)

[Jan.capon@cognus.org.uk](mailto:Jan.capon@cognus.org.uk) - Early Years Adviser

[Nick.Banham@cognus.org.uk](mailto:Nick.Banham@cognus.org.uk) – Early Years Adviser

Ofsted – General Enquiries Telephone - 0300 123 1231

[Report a serious childcare incident - GOV.UK \(www.gov.uk\)](https://www.gov.uk/report-a-serious-childcare-incident)

NSPCC helpline - 0808 800 5000

Email - [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

Sutton Police Station Telephone – 0300 123 1212



## 2.2 Whistleblowing Policy

### Definition:

Whistleblowing is raising a concern about malpractice within an organisation.

### Policy Statement

Cheam Baptist Church Pre-school is an organisation committed to delivering a high-quality pre-school service, promoting organisational accountability and maintaining public confidence. This policy provides individuals in the workplace with protection from victimisation or punishment, where they raise a genuine concern about misconduct or malpractice within the Pre-school. The policy is underpinned by the Public Interest Disclosure Act 1998, which encourages people to raise concerns about misconduct or malpractice in the workplace, in order to promote good governance and accountability in the public interest. It seeks to protect employees from discrimination as a result of 'blowing the whistle' on their organisation, or individuals within it, through amendments to employment law.

### Procedures

The Act covers behaviour, which amounts to:

- A criminal offence has been committed, is being committed or is likely to be committed
- A person has failed, is failing or is likely to fail to comply with any legal obligation to which he or she is subject. This includes non-compliance with policies and procedures, breaches of EYFS and/or registration requirements
- Conduct around safeguarding/child protection concerns
- Any act of discrimination
- A miscarriage of justice has occurred, is occurring or is likely to occur
- A person has failed, is failing or is likely to fail to comply with any legal obligation to which he or she is subject. This includes non-compliance with policies and procedures, breaches of EYFS and/or registration requirements
- Inappropriate use of power or authority
- Unacceptable practice or behaviour
- Improper conduct
- The health and safety of any individual has been, is being or is likely to be endangered
- The working environment has been, is being or is likely to be damaged.
- That information tending to show any matter falling within any one of the preceding clauses has been, is being or is likely to be deliberately concealed

It is not intended that this policy be a substitute for, or an alternative to our formal Grievance Procedure, but is designed to nurture a culture of openness and transparency within Cheam Baptist Church Pre-school, which makes it safe and acceptable for employees and volunteers to raise, in good faith, a concern they may have about misconduct or malpractice. This will be dealt with in confidence and without fear of reprisals and whenever possible all action taken will protect the identity of the whistle blower.

Staff or students should raise concerns with the manager in writing and include:

- Reference to the fact that it is a whistleblowing disclosure
- The background and history of the concerns
- Names, dates and places (where possible)
- The reason why the person is concerned about the situation

Staff who feel unable to put their concerns in writing, can speak to the Pre-school Committee Chairperson or Safeguarding Designated Officer.

An employee or volunteer who, acting in good faith, wishes to raise such a concern in confidence should normally report the matter to the manager who will advise the employee or volunteer of the action that will be taken in response to the concerns expressed. Concerns should be investigated and resolved as quickly as possible and the individual should receive a response that indicates the progress to date, how the matter is being dealt with and how long it will take to provide a final response. In order to protect individuals, initial enquires will be made to decide whether an investigation is appropriate and, if so, what form it should take. Some concerns may be resolved at this initial stage simply, by agreed action or an explanation regarding the concern, without the need for further investigation. If the concern has not been dealt with effectively the individual has a right to refer the concerns to Ofsted.

If an employee or volunteer feels the matter cannot be discussed with the manager (see Grievance procedure) or chair of committee, he or she should contact our Early Years Advisor Nick Banham at Cognus Sutton, NSPCC Advice helpline 0800 028 0285 [help@nspcc.org.uk](mailto:help@nspcc.org.uk) or OFSTED on 0300 123 1231 for advice on what steps to follow.

A disclosure in good faith to the manager and/or chair of committee will be protected. Confidentiality will be maintained wherever possible and the employee or volunteer will not suffer any personal detriment as a result of raising any genuine concern about misconduct or malpractice within the organisation.

### **2.3 Uncollected Child policy**

If a parent or designated carer fails to collect a child at the end of a session the following procedure will be followed:

- After ten minutes we will attempt to telephone the child's parent or carer.
- If they cannot be contacted, we will telephone the second emergency contact number on the registration form and any other numbers given such as parent's place of work.
- If all the above attempts fail, the Pre-school Manager and Church Office will be informed, the child will remain on the Premises in the care of at least two adults. We will continue to try to contact the parent or carer.
- If there is no contact after thirty minutes and if staff are no longer able to stay with the child, Social Services will be informed and their instructions taken. OFSTED will also be notified and the relevant form completed.

We reserve the right to charge **£20** per occasion if children are collected late or **£30** if over half an hour.



## **2.4 MISSING CHILD POLICY**

We are committed to providing a safe and secure environment in which children can grow and develop. We have a high level of security including locks and double handles on main external doors, and a secure adjoining outside play area. We carry out daily security checks and regular Risk Assessments (see Safety Statement). Risk Assessments are carried out prior to outings and every child is allocated to the care of a specific adult, with higher-than-normal ratios, as appropriate.

Every effort will be made to ensure the children's safety whilst they are at Pre-school. A register will be taken as the children arrive and the door will be locked at the latest from 9.15 am morning session arrivals, 12.15pm lunch club arrivals, 12.45pm afternoon session arrivals. Parents/visitors entering or leaving the building are required to ensure that a member of staff is available to lock the door behind them.

In the unlikely event of a missing child, the following procedures will be followed, whilst at least two members of staff supervise the remaining children:

1. The Leader and all staff will be alerted and the register checked.
2. The Pre-school premises will be quickly searched and the Church Office staff alerted.
3. At least one member of staff will search outside the premises and in the main Church building taking the Pre-school mobile phone with them.
4. If a child remains missing and after no longer than ten minutes, the police will be informed as well as the child's parents/guardians.
5. Searches will continue to be made while waiting for the police to arrive.
6. A report will be written, and OFSTED will be informed of any incidents.



## **2.5 Concerns and allegations of harm or abuse against staff, volunteers or reserve staff**

Concerns may come from a parent, child, colleague, or the public. Allegations or concerns must be referred to the DSL/Deputy without delay - even if the person making the allegation later withdraws it.

### **What is a low-level concern?**

The NSPCC defines a low-level concern as *'any concern that an adult has acted in a way that:*

- *is inconsistent with the staff code of conduct, including inappropriate conduct outside of work*
- *doesn't meet the threshold of harm or is not considered serious enough...to refer to the local authority.*

*Low-level concerns are part of a spectrum of behaviour. This includes:*

- *inadvertent or thoughtless behaviour*
- *behaviour that might be considered inappropriate depending on the circumstances.*
- *behaviour which is intended to enable abuse.*

*Examples of such behaviour could include:*

- *being over friendly with children*
- *having favourites*
- *adults taking photographs of children on their mobile phone.*
- *engaging with a child on a one-to-one basis in a secluded area or behind a closed door*
- *using inappropriate sexualised, intimidating or offensive language'*

(NSPCC [Responding to low-level concerns about adults working in education](#))

### **Responding to low-level concerns**

Any concerns about the conduct of staff, students or volunteers must be shared with the DSL and recorded. The DSL should be informed of all concerns, including those that may be considered 'low level' and make the final decision on how to respond. Where appropriate this can be done in consultation with other DSLs.

Reporting concerns about the conduct of a colleague, student or volunteer contributes towards a safeguarding culture of openness and trust. It ensures that adults consistently model the setting's values and helps keep children safe. It protects adults from potential false allegations or misunderstandings.

If it is not clear that a concern meets the local authority threshold, the DSL should contact the LADO for clarification.

In most instances, low-level concerns about staff conduct can be addressed through supervision, training, or disciplinary processes where an internal investigation may take place.

### **Identifying**

An allegation against a member of staff, volunteer or agency staff constitutes serious harm or abuse if they:

- behaved in a way that has harmed, or may have harmed a child
- possibly committed a criminal offence against, or related to, a child
- behaved towards a child in a way that indicates they may pose a risk of harm to children
- behaved or may have behaved in a way that indicates they may not be suitable to work with children

### **Informing**

- All staff report allegations to the DSL.
- The DSL alerts the Designated Officer for their setting. If the Designated Officer is unavailable the DSL contacts their equivalent (Church Safeguarding Officer) until they get a response- which should be within 3-4 hours of the event. Together they should form a view about what immediate actions are taken to ensure the safety of the children and staff in the setting, and what is acceptable in terms of fact-finding.
- It is essential that no investigation occurs until, and unless, the Local Authority Designated Officer (LADO) has expressly given consent for this to occur, however, the person responding to the allegation does need to have an understanding of what explicitly is being alleged.
- The DSL must take steps to ensure the immediate safety of children, parents, and staff on that day within the setting.
- The LADO is contacted as soon as possible and within one working day.
- A child protection referral is made if required. The LADO, line managers and local safeguarding children's services can advise on whether a child protection referral is required.
- The DSL asks for clarification from the LADO on the following areas:
  - what actions the DSL must take next and when and how the parents of the child are informed of the allegation
  - whether or not the LADO thinks a criminal offence may have occurred and whether the police should be informed and if so, who will inform them

- whether the LADO is happy for the setting to pursue an internal investigation without input from the LADO, or how the LADO wants to proceed
- whether the LADO thinks the person concerned should be suspended, and whether they have any other suggestions about the actions the designated person has taken to ensure the safety of the children and staff attending the setting
- The DSL records details of discussions and liaison with the LADO including dates, type of contact, advice given, actions agreed and updates on the child's case file.
- Parents are not normally informed until discussion with the LADO has taken place, however in some circumstances the DSL may need to advise parents of an incident involving their child straight away, for example if the child has been injured and requires medical treatment.
- Staff do not investigate the matter unless the LADO has specifically advised them to investigate internally. Guidance should also be sought from the LADO regarding whether or not suspension should be considered. The person dealing with the allegation must take steps to ensure that the immediate safety of children, parents and staff is assured. It may be that in the short-term measures other than suspension, such as requiring a staff member to be office based for a day, or ensuring they do not work unsupervised, can be employed until contact is made with the LADO and advice given.
- The DSL ensures staff fill in 'Safeguarding Incident Reporting' form.
- If after discussion with the DSL, the LADO decides that the allegation is not obviously false, and there is cause to suspect that the child/ren is suffering or likely to suffer significant harm, then the LADO will normally refer the allegation to children's social care.
- If notification to Ofsted is required the DSL will inform Ofsted as soon as possible, but no later than 14 days after the event has occurred. The DSL will liaise with the Designated Officer about notifying Ofsted.
- The DSL ensures that the 'Confidential Safeguarding Incident Reporting' form is completed and sent to the Designated Officer. If the Designated Officer is unavailable their equivalent (Church Safeguarding Officer) must be contacted.
- Avenues such as performance management or coaching and supervision of staff will also be used instead of disciplinary procedures where these are appropriate and proportionate. If an allegation is ultimately upheld the LADO may also offer a view about what would be a proportionate response in relation to the accused person.
- The DSL must consider revising or writing a new risk assessment where appropriate, for example if the incident related to an instance where a member of staff has physically intervened to ensure a child's safety, or if an incident relates to a difficulty with the environment such as where parents and staff are coming and going and doors are left open.
- All allegations are investigated even if the person involved resigns or ceases to be a volunteer.

### **Allegations against reserve staff**

Any allegations against reserve staff must be responded to as detailed in this procedure. In addition, the DSL must contact the agency (if used) following advice from the LADO



### **Allegations against the DSL**

- If a member of staff has concerns that the DSL has behaved in a way that indicates they are not suitable to work with children as listed above, this is reported to the Designated Officer who will investigate further.
- During the investigation, the Designated Officer will identify one of the DSL Deputies to take on the role of DSL.
- If an allegation is made against the Designated Officer, then the Trustees are informed.

### **Recording**

- A record is made of an allegation/concern, along with supporting information. This is then entered on the file of the child, and the Child welfare and protection summary is completed and placed in the front of the child's file.
- If the allegation refers to more than one child, this is recorded in each child's file
- If relevant, a child protection referral is made, with details held on the child's file.

### **Disclosure and Barring Service**

- If a member of staff is dismissed because of a proven or strong likelihood of child abuse, inappropriate behaviour towards a child, or other behaviour that may indicate they are unsuitable to work with children such as drug or alcohol abuse, or other concerns raised during supervision when the staff suitability checks are done, a referral to the Disclosure and Barring Service is made.

### **Escalating concerns**

- If a member of staff believes at any time that children may be in danger due to the actions or otherwise of a member of staff or volunteer, they must discuss their concerns immediately with the DSL.
- If after discussions with the DSL, they still believe that appropriate action to protect children has not been taken they must speak to the Designated Officer.
- If there are still concerns then the whistle blowing procedure must be followed, as set out in 2.2 Whistleblowing Policy.

## **2.6 Visitor or intruder on the premises**

The safety and security of the premises is maintained at all time and staff are vigilant in areas that pose a risk.

**Visitors with legitimate business** - generally a visitor will have made a prior appointment

- On arrival, they are asked to verify their identity and confirm who they are visiting.
- Staff will ask them to sign in and explain the procedures for the use of mobile phones and emergency evacuation.
- Visitors are never left alone with the children at any time.
- Visitors to the setting are monitored and asked to leave immediately should their behaviour give cause for concern.

### **Intruder**

An intruder is an individual who has not followed visitor procedures and has no legitimate business to be in the setting; he or she may or may not be a hazard to the setting.

- An individual who appears on the premises with no prior appointment and seems to have no business in the setting will be asked for their name and purpose for being there through the small hall window. Once confirmed as a legitimate visitor only then will a staff member go and open the door to them.
- The staff member identifies any risk posed by the intruder.
- The staff member ensures the individual follows the procedure for visitors.
- The setting manager is immediately informed of the incident and takes necessary action to safeguard children.
- If there are concerns for the safety of children, staff evacuate them to a safe place in the building and contact police. In some circumstance this could lead to 'lock-down' of the setting and will be managed by the responding emergency service (see Lockdown Policy).
- The DSL informs the Designated Officer of the situation at the first opportunity.
- In the case of a serious breach where there was a perceived or actual threat to the safety of the children, the Manager/DSL completes Confidential safeguarding incident report form and copies in the Pre-school Committee Chairperson on the day of the incident. The Trustees ensure a robust organisational response and ensure that learning is shared.





## **2.7 E-SAFETY POLICY**

(Including all electronic devices with internet capacity)

### **ONLINE SAFETY**

It is important that children and young people receive consistent messages about the safe use of technology and can recognise and manage the risks posed in both the real and the virtual world.

Terms such as 'e-safety', 'online', 'communication technologies' and 'digital technologies' refer to fixed and mobile technologies that adults and children may encounter, now and in the future, which allow them access to content and communications that could raise issues or pose risks. The issues are:

*Content* – being exposed to illegal, inappropriate or harmful material

*Contact* – being subjected to harmful online interaction with other users

*Conduct* – personal online behaviour that increases the likelihood of, or causes, harm

### **I.C.T EQUIPMENT**

- The Pre-school Manager ensures that all computers have up to date virus protection installed and are password protected.
- Tablets are only used by staff to play age-appropriate music for the pre-school children, and to take photographs for observation and assessment purposes to be included in individual children's learning journeys.
- Tablets are password protected and when not in use are always stored securely.
- The interactive screen is only used by children under strict supervision of a member of staff and only using apps/material that has previously been checked by a member of staff.

### **INTERNET ACCESS**

- Children never have unsupervised access to the internet.
- Only reputable sites with a focus on early learning are used (e.g. CBeebies).
- Video sharing sites such as YouTube are only used by staff to show carefully selected videos, that have been fully vetted. These videos are set up and prepared without the children watching so that adverts are not shown.

- Children are taught the following stay safe principles in an age-appropriate way:
  - only go online with a grown up
  - be kind online **and** keep information about me safely
  - only press buttons on the internet to things I understand
  - tell a grown up if something makes me unhappy on the internet
- Staff support children's resilience in relation to issues they may face online, and address issues such as staying safe, appropriate friendships, asking for help if unsure, not keeping secrets as part of social and emotional development in age-appropriate ways.
- All electronic equipment for use by children is sited in an area clearly visible to staff.
- Staff report any suspicious or offensive material, including material which may incite racism, bullying or discrimination to the manager who will report it, as appropriate, to the Internet Watch Foundation ([www.iwf.org.uk](http://www.iwf.org.uk)).

The pre-school manager ensures staff have access to age-appropriate resources to enable them to assist children to use the internet safely.

#### **PERSONAL MOBILE PHONES – STAFF AND VISITORS** (includes internet enabled devices)

- Personal mobile phones and internet enabled devices are not used by staff during working hours. This does not include breaks where personal mobiles may be used off the premises or in a safe place e.g. office and kitchen. The pre-school manager completes a risk assessment for where they can be used safely.
- Personal mobile phones of all staff and anyone volunteering or visiting the Pre-school to support/work with the children, are kept in bags in the office or kitchen.
- Parents and visitors who are visiting the Pre-school and will be constantly supervised by a member of staff, i.e. a prospective parent being shown around, are asked to ensure their mobile phone is always kept in a closed bag or pocket.
- In an emergency, personal mobile phones may be used in the privacy of the office or kitchen, with permission.
- Staff ensure that contact details of the Pre-school are known to family and people who may need to contact them in an emergency.
- Members of staff do not use personal equipment to take photographs of children.

- Parents and visitors do not use their mobile phones on the premises. Signs clearly showing no mobile phones are displayed in the front window, the foyer and on the inside door. They can be pointed to when parents are non-compliant.
- There is an exception if a visitor's company/organisation operates a policy that requires contact with their office periodically throughout the day. Visitors are advised of a private space where they can use their mobile.

## **CAMERAS, VIDEOS AND IMAGE RECORDING**

- Members of staff do not bring their own cameras, video recorders or image recording technology, except for mobile phones (see above), to the setting.
- Professionals visiting the setting, needing to use their own laptop/iPad, will be required to cover the camera with masking tape.
- Photographs/recordings of children are only taken for valid reasons, e.g. to record learning and development, or for displays, and are only taken on equipment belonging to the setting.
- Camera and video use is monitored by the Pre-school Manager.
- Where parents request permission to photograph or record their own children at special events, general permission is first gained from all parents for their children to be included. Parents are told they do not have a right to photograph or upload photos of anyone else's children.
- Photographs/recordings of children are only made if relevant permissions are in place.
- If photographs are used for publicity, parental consent is gained and safeguarding risks minimised, e.g. children may be identified if photographed in a sweatshirt with the name of their setting on it.

## **CYBER BULLYING**

If staff become aware that a child is the victim of cyber-bullying at home or elsewhere, they discuss this with the parents and refer them to help, such as: NSPCC Tel: 0808 800 5000 [www.nspcc.org.uk](http://www.nspcc.org.uk) or ChildLine Tel: 0800 1111 [www.childline.org.uk](http://www.childline.org.uk)

## **USE OF SOCIAL MEDIA**

Staff are expected to:

- understand how to manage their security settings to ensure that their information is only available to people they choose to share information with
- ensure the organisation is not negatively affected by their actions and do not name the setting

- are aware that comments or photographs online may be accessible to anyone and should use their judgement before posting
- are aware that all images, may be accessed by others and a permanent record of them made, for example, by taking a screen shot of the image with a mobile phone
- observe confidentiality and refrain from discussing any issues relating to work
- not share information they would not want children, parents or colleagues to view
- set privacy settings to personal social networking and restrict those who are able to access
- not accept service users/children/parents as friends, as it is a breach of professional conduct
- report any concerns or breaches to the DSL/Deputies
- not engage in personal communication, including on social networking sites, with children and parents with whom they act in a professional capacity. There may be occasions when the practitioner and family are friendly prior to the child coming to the setting. In this case information is shared with the manager and a risk assessment and agreement in relation to boundaries are agreed

#### **USE DISTRIBUTION OF INAPPROPRIATE IMAGES**

- Staff are aware that it is an offence to distribute indecent images and that it is an offence to groom children online. In the event of a concern that a colleague is behaving inappropriately, staff advise the DSL/Deputies who follow procedures for allegations against staff, volunteers or agency staff.

Reviewed March 2025  
To be reviewed March 2026