



Policies and Procedures

Park lane Kids Ltd

March 2017

www.parklanekids.co.uk



1/5/2017 *S. Faulkner* • date to be reviewed 1/5/2018

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Park Lane Kids Ltd – Policies and procedures – updated 01/10/2016

(All staff to receive a copy and to date and sign the master copy in the office to acknowledge they have received and read their copy)

Regular quiz's, professional discussions and supervisions will monitor staff's understanding of these policies and procedures.

- P.5 Safeguarding Children policy and procedure including Prevent and FBV
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SAFEGUARDING CHILDREN POLICY

A **'child'** for the purpose of this policy and procedure is anyone who has not yet reached their 18th birthday and includes students, volunteers and any apprentices under 18.

Safeguarding is the activities, policies and procedures that underpin daily practice for staff, parents and children that prevent or reduce the risk of harm or abuse to children.

Child protection refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

Child abuse is when another person, whether through action or failing to act, causes injury, death, emotional harm or risk of serious harm to a child. There are many forms of child maltreatment, including neglect, physical abuse, sexual abuse, sexual exploitation, domestic violence, digital technology, bullying, gender-based violence, radicalisation, child sexual exploitation, teenage relationship abuse, FGM, fabricated or induced illness, poor parenting, emotional abuse and any other issues not listed that pose a risk to children.

Recruitment and Retention;

Robust recruitment and retention procedures ensure that only suitable people are employed and continued to be employed by the company.

- Job adverts will quote "safeguarding children is our priority" and request DBS and references are undertaken.
- Application forms will ask for full job history and gaps in early years will be challenged during interview.
- Identification documents will be checked to confirm the applicant is eligible to work in the UK.
- During the interview process applicants will be required to answer a series of scenarios to establish their morals and values that test their attitudes towards safeguarding.
- A new advanced DBS will be taken for all new applicants or the on-line check completed if they have subscribed to update service.
- It will be made clear to applicants for posts within the setting, that any position is exempt from the provisions of the Rehabilitation of Offenders Act 1974.
- All applicants for work for Park Lane Kids Ltd whether voluntary or paid will be interviewed before an appointment is made, and will be asked to provide at least two references. All such references will be followed up.

Staff inductions

All staff complete a 6 week induction, to ensure they understand the policies, procedures and staff handbook and are clear in their roles and responsibilities and reporting procedures if they see or hear something that requires reporting. During this time their on-going suitability to work with children is monitored.

Performance management

Regular monitoring/supervisions and peer observations ensure staff maintain the highest level of professional conduct so that children are safeguarded. It is hoped that the regular opportunity for professional discussions will help to identify early, any concerns in staff suitability or potential risks to children.

On-going Suitability

Staff are informed that they are expected to disclose any convictions, cautions, court orders, reprimands and warnings which may affect their suitability to work with children (whether received before or during their employment at the setting). This is checked annually at the same time as the annual safeguarding training.

We maintain a record of staff qualifications and the vetting process. Identity checks are carried out during the interview process to confirm their suitability to work in the UK and to clarify they are who they are claiming to be. A DBS check is completed for every paid and volunteer member of the staff team and the reference number and date of issue recorded and kept in the office. Two references are completed and any gaps in employment challenged during the interview and recorded.

We record information about staff taking medication to establish if they are fit to work the children and that their medication is stored appropriately. (Health Declaration form). Risk assessments are undertaken for staff whose medication could have a detrimental impact on their suitability to work.

TRAINING

Safeguarding training is in-line with the LCSB Safeguarding Competency Framework that sets the minimum requirements for training, renewed as a minimum every three years. Training will ensure that staff are able to identify signs of possible abuse and neglect at the earliest opportunity, and to respond in a timely and appropriate way. Once inductions have been completed and staff reach the end of their probationary period, safeguarding training is embedded into daily practice, for example;

- Regularly staff meetings that provide the opportunity to discuss current issues and changes in legislation or policy
- Regular company newsletters to inform of relevant information
- Sharing of local or National news
- Supervisions and peer reviews
- Safeguarding training
- Closed Facebook page to share articles, have professional discussions.
- 1:1 professional discussions

WHAT IS A WELFARE CONCERN?

The key person will have a strong bond with the child and will therefore, be in a position to notice any change that may indicate they are being abused. It is important that you share any of the below indicators with the designated person, who will assess whether the information needs referring;

- Any significant and worrying changes in children's behaviour
- Any unexplained bruises or marks
- Any comments children make which give cause for concern
- Any deterioration in a child's general well-being.
- Any disclosures
- Signs of abuse or neglect are seen
- Someone tells you directly they have seen or heard something

HOW TO RESPOND APPROPRIATELY TO SUSPICIONS OF ABUSE:

- React calmly
- Be aware of your body language and responses
- Keep responses simple, short, slow and gentle
- Move away from other children
- Tell them they have done the right thing in telling you
- Avoid making judgments
- Don't promise to keep it a secret
- Don't stop a child or adult who is talking freely
- Observe and listen but don't ask for more information
- All disclosures or observations will be documented before speaking to the designated person.

THE ROLE OF THE DESIGNATED PERSON – your manager, or in their absence the assistant manager/deputy manager or the manager at the other setting or the owner;

- To take all necessary steps to keep children safe and well
- Be alert to any issues for concern in the child's life at home or elsewhere
- To offer emotional support for the member of staff reporting the concern
- Liaising with local statutory children's services agencies and with the LSCB
- Implement the policy and ensure staff understand and comply with it at all times
- To ensure staff are competent in their knowledge of safeguarding
- Provide support, advice and guidance to staff
- Up to date DBS for all staff
- Liaison with social services
- Attending case conferences

Carers will normally be the first point of reference for the designated person, except where the designated person believes it would cause further harm to the child or an adult

All such suspicions and investigations will remain confidential, shared only by those who need to know. The people most commonly involved will be the setting manager, staff and the owner.

IMPORTANCE OF KEEPING RECORDS:

A Welfare Concern will be kept in a separate file and stored securely in the office. Only authorised persons are permitted to access these files. Normally these records will be passed to the police and Social Care by the designated person as soon as possible. It is equally important to record the reasons for making the decision **not** to refer to First Response as when the decision is taken to refer. All records must be retained.

(Please see staff guide 'Record keeping')

CONFIDENTIALITY:

Safeguarding children is extremely confidential and information will only be shared with staff directly involved with an allegation. It is not appropriate to openly talk about any sensitive information and this should never be discussed in a public place.

PLANNING:

Safeguarding children should be, both re-active and pro-active. Staff need to ensure that opportunities for children to talk about worries or concerns are included in their planning and children are given strategies to protect themselves and the confidence and knowledge of how and when to say 'no' and who to report this to.

EARLY HELP (previously known as a CAF)

The term Early Help is used to describe the process of taking action early and as soon as possible to tackle problems emerging for children, young people and their families. It includes universal help that is offered to an entire population to prevent problems developing.

From April 2013, the remit of the Children's Central Duty Team was expanded to include requests for early help. The new name is EARLY HELP. Staff need parents' consent to complete a form, however, please consider taking this route, as quite often early intervention can prevent a more serious incident.

The designated person will complete a 'request for service form'. The emphasis of this form is identification of the circumstances and needs that are causing concern for a child or family, and what needs to be done to improve the situation.

For new referrals the pathway into the service will be through First Response Children's Duty (FRCD). FRCD will transfer appropriate referrals to the relevant locality team or where discussion is required to the locality hubs

Children's Duty: 0116 305 0005 and ask for P3 Desk.

FIRST RESPONSE (Child protection)

Phone 999 if a crime is being committed or if a child is in immediate danger.

Contact Leicestershire police on 101 if you think a crime has been committed but there is no immediate danger.

Contact the First Response Children's Duty Team if you think a child is being:

- neglected
- physically abused
- sexually abused

Telephone them if you have urgent concerns about a child who needs a social worker or police officer on the day:

Tel 0116 305 0005 (24 hour phone line)

INFORMING OFSTED

Ofsted must be informed on 0300 1231231 if there are any concerns that a child has suffered serious harm or abuse by another person or if there is an allegation against a member of staff. This must happen within 14 days.

All staff will have access to a copy of:

“Keeping children safe is everybody’s business” and “What to do if you’re worried a child is being abused”

INFORMING LADO

The Local Area Designated Officer (LADO) must always be informed about any concerns or allegations against a member of staff. This should be done prior to starting an internal investigation and Ofsted informed immediately. The member of staff will be suspended while there is an on-going investigation.

Mark Goddard / Karen Brown – 0116 3057597

THE USE OF MOBILE PHONES, TABLETS AND SMART WATCHES

Staff are not permitted to use their mobile phone, smart watch (wearable device) or personal camera at any time whilst caring directing for children. Mobile phones must be locked in staff lockers at all times and only used during staff breaks. Any member of staff caught with their mobile phone or personal camera in the presence of children will be subject to disciplinary. The setting will provide a mobile phone for staff to use during outings.

The setting will provide tablets for the electronic recording of observations and assessments. These are locked down so they cannot access the internet and photographs are stored on the external server, so no local files are kept. This ensures that no sensitive data can be misused if the tablets are lost or stolen.

E-SAFETY

We live in age of digital technology and need to keep children safe. Within the setting it is important to ensure that any devices the children have access to will not permit them to view inappropriate data and that children are closely monitored while they use the internet.

The setting face book page will not be-friend children and staff are not to engage in on-line gaming with children at the setting.

Staff should educate and inform children about the dangers of using the internet and how to protect themselves. This can include:

- E-books or stories with an internet theme
- Circle time or social group discussions
- Role play equipment
- Films and media
- Clear messages about reporting.

Adults need to understand the risks posed by other adults who use technology, including the internet to bully, groom, radicalise or abuse children or learners.

Staff are required to be good role models at all time when they use the internet in the setting.

The owner is a CEOPS TUK internet safety ambassador and provides training to staff member to enable them to deliver internet safety sessions to children.

MISSING OR ABSENT CHILDREN

If children have periods of absence that are not accounted for then we must take all reasonable steps to ensure they are safe from harm. In the first instance the key person will call the parent and note the reason the child is absent. If they have been absent on 3 consecutive sessions and there is no explanation, then the manager may do a home visit to check the child and parent are OK.

CHILDREN WHO HAVE SPECIAL EDUCATIONAL NEEDS AND/OR DISABILITIES

There may be additional barriers that exist when recognising signs of abuse or neglect of children who have special educational needs and/or disabilities. Therefore, it is important to treat every child the same and share any concerns immediately.

THE PREVENT DUTY & PROMOTING BRITISH VALUES

From the 1st July 2015 all schools, registered early years' childcare providers and registered later years' childcare providers are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015, in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism" This is duty is known as the Prevent Duty.

Here at Woodlands and Park Lane Nursery we take safeguarding very seriously, therefore to ensure that we adhere to and achieve the Prevent Duty we will endeavour to:

- Provide appropriate training for staff as soon as possible. Part of this training will enable staff to identify children who may be at risk of radicalisation.
- We will build the children's resilience by promoting fundamental British values and enable them to challenge extremist views (In early years, the statutory framework for the EYFS sets standards for learning, development and care for children 0-5, thereby assisting personal, social and emotional development and understanding of the world)
- We will assess the risk, by means of formal risk assessment, of children being drawn into terrorism, including support for extremist ideas that are part of the terrorist ideology.
- We will ensure staff understand the risks so they can respond in an appropriate and proportionate way.
- We will be aware of the online risk of radicalisation through the use of social media and the internet.
- As with managing our safeguarding risks, our staff will be alert to changes in children's behaviour which could indicate that they may be in need of help or protection (children at risk of radicalisation may display different signs or may seek to hide their views). The key person approach means we already know our children well and so we will notice any changes in behaviour, demeanour or personality quickly.
- We will not carry out unnecessary intrusion into family life but we will take action when we observe behaviour of concern. The key person approach means we already have a rapport with our families so we will notice any changes in behaviour, demeanour or personality quickly.
- We will work in partnership with our local LSCB for guidance and support.
- We will build up an effective engagement with parents/carers and families (This is important as they are in a key person position to spot signs of radicalisation)
- We will assist and advise families who raise concerns with us. It is important to assist and advise families who raise concerns and be able to point them in the right direction and the right support mechanisms.
- We will ensure that our DSO's will undertake Prevent awareness training (as a minimum) so that they can offer advice and support to other members of staff.
- We will ensure that any resources used in the nursery are age appropriate for the children in our care and that our staff have the knowledge and confidence to use the resources effectively.

For further information with regards to how the EYFS can help children and staff understand British Values and The Prevent Duty, please refer to sections Personal, Social and Emotional Development (PSED) and Understanding the World (UTW)

To help understand how this is put into practice a few examples are as follows:

Democracy: Making decisions together: PSED

- Managers and staff can encourage children to see their role in the bigger picture, encouraging children to know their views count, value each other's views and values and talk about their feelings, for example when they do or do not need help. When appropriate demonstrate democracy in action, for example, children sharing views on what the theme of their role play area could be with a show of hands.
- Staff can support the decisions that children make and provide activities that involve turn taking, sharing and collaboration. Children should be given opportunities to develop enquiring minds in an atmosphere where questions are valued.

Rule of Law: Understanding rules matter: PSED

- Staff can ensure that children understand their own and other's behaviours and its consequences, and to distinguish right from wrong.
- Staff can collaborate with children to create the rules and codes of expected behaviour, for example, to agree the rules about tidying up and ensure all children understand rules apply to everyone.

Individual Liberty: Freedom for all: PSED & UTW

- Children should develop a positive sense of themselves. Staff can provide opportunities for children to develop their self-knowledge, self-esteem and increase their confidence in their own abilities, for example, allowing children to take risks on an obstacle course, mixing colours, talking about their experiences and learning.
- Staff should encourage a range of experiences that allow children to explore the language of feelings and responsibility, reflect on their differences and understand we are free to have different opinions, for example, in a small group discuss how they feel about the transition from nursery to school.

Mutual Respect and Tolerance: treat others as you want to be treated: PSED & UTW

- Managers and leaders should create an ethos of inclusivity and tolerance where views, faiths, cultures and race are valued and children are engaged with the wider community.
- Children should acquire a tolerance and appreciation of and respect their own and other cultures: know about similarities and differences between themselves and other among families, faiths, communities, cultures and traditions and share practices, celebrations and experiences.
- Staff should encourage and explain the importance of tolerant behaviours such as sharing and respecting other people's opinions.
- Staff should promote diverse attitudes and challenge stereotypes, for example, sharing stories that reflect and value diversity of children's experiences and providing resources and activities that challenge gender, cultural and racial stereotyping.

What is not acceptable:

- Actively promoting intolerance of other faiths, cultures and races/
- Failure to challenge gender stereotypes and routinely segregating boys and girls.
- Isolating children from the wider community.
- Failure to challenge behaviours (whether this is staff, children or parents) that are not in line with the fundamental British values of democracy, rule of law, individual liberty, mutual respect and tolerance for those with different faiths and beliefs.

Making a child protection referral to Children's Social Care

An adult has a concern about the safety/welfare of a child.

RECORD

Share the concern with the designated person (your manager)

The concern involves immediate risk of significant harm or clear allegation of abuse

The concern involves a serious concern about a child's welfare such as an ongoing serious neglect or emotional harm

There is concern but a lack of information, or uncertainty about whether to refer to children's services

The concern involves ongoing worries about a child's needs being met and the family appear to need co-ordinated support.

The First Response team (previously children's duty team) process all new priority 1 and 2 cases.

The electronic Agency Referral Form (Leicestershire County only) is secure and should be used to report concerns regarding a child or young person that need social work or police intervention.

www.leics.gov.uk/firstresponse

Urgent referrals requiring social work or police intervention on that day can be made by telephone to: 0116 305 0005

Ring the professional help line for safeguarding advice, please call
0116 305 5500
(Monday to Friday
9am – 4.30pm).

The term **Early Help** is used to describe the process of taking action early and as soon as possible to tackle problems emerging for children, young people and their families and to avoid the need for involvement of social work teams.

Effective help may occur at any point in a child or young person's life.

Staff, with parents consent can request for services for children, young people and their families who feel they may need some additional support.

The secure e-form is completed at www.leics.gov.uk/index/children_families/early_help.htm

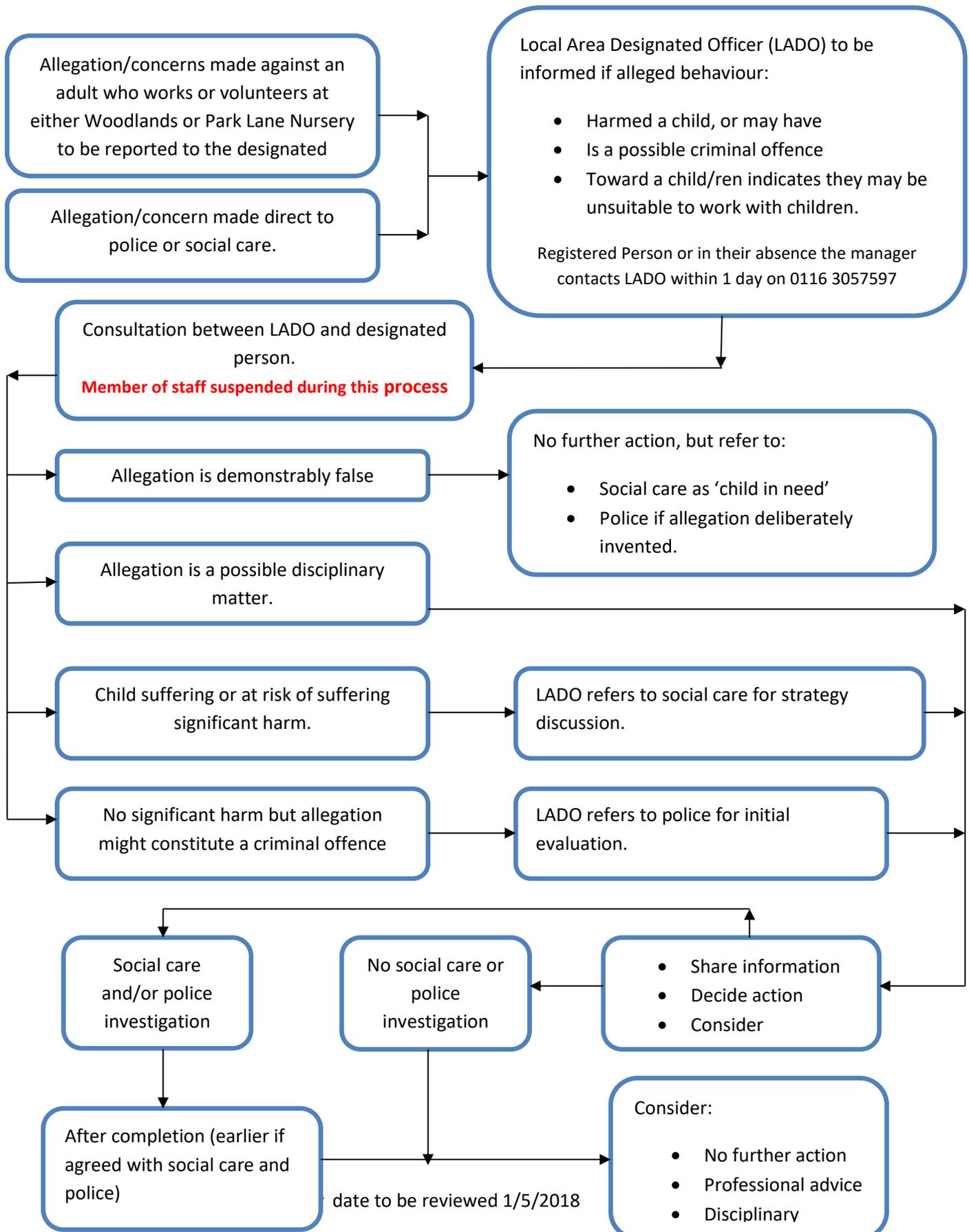
The form is sent to the Local Hub who typically meet every two weeks. They share information with other agencies and decide which services are best able to give support and advice and the appropriate course of action.

All enquiries or referrals where the child or family already have an allocated worker (Social Worker or other type of worker) are to go through the allocated team or worker.

If you are worried that a child is in immediate danger or at risk of immediate harm, please call us on 0116 305 0005 (24hrs a day), or the Police on 101 or 999.

Allegations of abuse against adults who work or volunteer at Park Lane Kids Ltd (Woodlands or park lane Nursery)

Parents should always complain directly to the childcare setting. The setting must inform Ofsted of any complaints or significant incidents and follow the procedure below:



POLICY - WHISTLE BLOWING

Employees are often the first to realise that there may be something seriously wrong within their setting. However, they may not express their growing concerns because they feel that speaking up would be disloyal to their colleagues. They may also fear harassment or victimisation. In these circumstances, it may be easier to ignore the concern rather than report what may be just suspicion of malpractice and wrongdoing at work.

Park Lane Kids Ltd is committed to the highest possible standards of openness, probity and accountability. In line with this commitment, we encourage employees and others with genuine concerns about any person linked with the setting and/or others (e.g. Parents/Carers) to come forward and voice those concerns.

There are existing procedures in place to enable you to lodge a grievance relating to staff's own employment, Parent/Carer concerns or complaints, and issues raised by outside agencies. This Whistle Blowing policy is intended to cover genuine concerns that fall outside the scope of other procedures.

Some signs potential concerns that may be raised through the whistle blowing procedure.

- Changes in staff personality that causes a concern
- Short tempered, cross with the children
- Inappropriate language towards children including name calling
- Rough handling
- Making opportunities to be out of sight or hearing of another staff.
- Neglect i.e not changing nappies or cleaning up from muddy play
- Shows disregard for the consequences
- Can't be bothered attitude
- Shows favouritism towards a small minority
- Bullying or intimidating children
- Breaches of confidentiality
- Not fit for work through alcohol, drugs or tiredness
- Rude or abrupt to children or staff
- No sense of authority
- Reckless in their actions
- Using mobiles or social media when caring for children

Park Lane Kids Ltd recognise that the decision to report a concern can be a difficult one to make, not least because of the fear of reprisal. Park Lane Kids Ltd will not tolerate harassment or victimisation and will take action to protect you when you raise a concern in good faith. However, should you feel that you have suffered harassment, either directly or indirectly as a result of raising a concern, you should refer to the Employees Handbook, or Complaints Policy.

Park Lane Kids Ltd will do its best to protect your identity when you raise a concern. However, it must be appreciated that, in the interests of natural justice, any investigation process may reveal the source of the information and a statement by you may be required as part of the evidence.

Anonymous Allegations

You are strongly encouraged to put your name to any allegation. Concerns expressed anonymously are much less powerful. Anonymous allegations will be considered and any action taken at the discretion of Park Lane Kids Ltd and in conjunction with the relevant agencies where appropriate.

In exercising this discretion, the following factors will be taken into account when considering how to deal with any allegations:

- The seriousness of the issues raised;
- The credibility of the allegation;
- The likelihood of confirming the allegation from attributable sources.

Malicious or Vexatious Allegations - Staff

If you make an allegation in good faith, but it is not confirmed by the investigation, no action will be taken against you. If, however, you make a malicious or vexatious allegation, disciplinary action may be taken against you in accordance with the Park Lane Kids Ltd Procedures.

HOW TO RAISE A CONCERN (For Employees)

As a first step, you should normally raise concerns with your Room Leader or Manager. This depends, however, on the seriousness and sensitivity of the issues involved and who you think may be involved in the malpractice. For example, if you believe that your Manager is involved, you should approach the Company Director (Samantha Faulkner or Lawrence Faulkner).

Concerns are better raised in writing. You are advised to set out background and history of your concerns, giving names, dates and places, where possible, and the reason why you are particularly concerned about the situation.

The earlier you express your concern, the easier it is for Park Lane Kids Ltd, Social Care or Ofsted to take action. Although you are not expected to prove the truth of an allegation, you will need to demonstrate to the person contacted that there are sufficient grounds for initial enquiries to be made.

STAFF BEHAVIOUR POLICY

We have several policies that tackle staff behaviour and these include:

- Staff taking medication (p.20)
- Disqualification (p.18)
- Recruitment and retention (p.18)
- Discipline and Grievance (staff handbook)
- Whistle blowing (p.16)
- Staff induction (p.15)
- Performance management and supervision (p.5)
- Use of social media (p.19)

POLICY - RECRUITMENT AND RETENTION

Job advertising

Vacancies will be discussed with the owner and manager and an advert placed in the where appropriate. All positions will state that 'all positions are subject to successful DBS and references'.

Taking the enquiries

First impressions are really important, so a short interview will be conducted over the telephone filling in the 'telephone enquiry form' followed with an invite to an interview.

Job descriptions

The company will have job descriptions and job specifications for all posts and all staff members will be given a copy with an application form.

Interview

Staff at the setting are to be notified when interviews will take place so they do not look unprepared and can warmly welcome the applicant.

When the applicant arrives it is important NOT to be busy but relaxed and calm. It is important that they come into a calm and relaxed environment that is well organised. A good firm hand shake is important and then remember to sign them into the visitor's book.

- Once signed in, show them around the setting, introducing them to both children and staff members and then use the office or staff room and make a cup of tea, this will put them more at ease.
- In an ideal situation it is best to have two people during the interview.
- There are set questions to work through.
- A peer observation to watch how the applicant engages with the children and staff
- Consider the views of the staff and children in the room
- Once they have had time in the room, normally about 30 minutes bring them out of the room and thank them for their time.

When sending the applicant home allow them any final questions and give them a date when you will be in touch with them. Remember to sign them out.

Shortlisting

With the help of the staff team and children it is important to short list the most promising applicants and then follow up their references.

Offering the position

On successful references and DBS checks the position will be offered, and the following needs to take place:

- 2 references requested
- ID documents checked along with right to work in the UK
- Issue staff uniform
- Take staff photo for the staff board and website
- Issue the staff handbook, policy pack, safeguarding pack and Health and safety book
- Take copies of all certificates and current DBS
- Checklist for starting work at the setting
- Book an induction day

Staff familiarisation

It is important for new staff members to visit the setting again before starting to familiarise themselves with the staff and the routines in the room. The room leader will allocate some time to go through these things with them.

First day at work

The manager will induct the new staff member ensuring they cover the following:

- A tour of the setting pointing out significant information
- Fire evacuation
- Accident and emergency procedures
- Where master documents are kept
- How to register children's attendance
- Allergies in the setting
- Health and hygiene procedures

Induction

New staff members will be given a 6-week induction pack that they will work through with the manager and senior practitioner.

Mentor

The new staff member will be allocated a mentor each day who will be on hand to offer extra support and to guide them through the correct procedures.

Unchecked staff

Any staff, student or volunteer that has not completed their suitability checks will not be left unsupervised at any time.

POLICY -SOCIAL MEDIA

The Company defines social media as any website or other medium (including video) that allows communication in the public domain (even where access may be restricted to a limited number of "friends"). This would include, but is not limited to, Twitter, Facebook, blogs, and comments posted on websites. Access to Social Media may be by computer, tablet, smart phone, or another handheld device. As technology develops, social media is likely to expand and there are likely to be new methods of access. This policy is intended to apply in relation to such new developments.

Comments, images and video, etc. that are posted on social media may be viewed by many different people and you normally have very little control over who may see them. It is important, therefore, that you ensure that you exercise some caution when using social media.

Staff may not use social media during working hours, unless for business purposes. In their own time they must ensure that you do not post any comments about, or images or videos of or about the Company. They must also ensure that they do not post any comments about, or images or videos of employees unless you have their permission, or if they are connected to them as "friends" and the posts are unrelated to work. In order to maintain an appropriate and professional relationship with those that use our service, staff must not become "friends" with the parents or children. If they are already "friends" with a parent or child and this predates either their start of employment or this policy, then they must discuss this with their line manager in order to decide on what action, if any, is appropriate.

POLICY - STAFF TAKING MEDICATION/OTHER SUBSTANCES

There will be no alcohol or other substances (drugs) on the premises and staff are not permitted to drink or use recreational drugs whilst on duty, if caught it may lead to immediate dismissal.

If staff are taking medication which may affect their ability to care for children, those staff should seek medical advice. If any medication changes, staff must inform the manger, who will carry out a risk assessment, to clarify the continued suitability of the member of staff.

Staff will be asked during their supervision about any changes to medication.

Staff medication on the premises will be stored securely and out of reach of children.

All staff complete an annual health declaration form, that is held on their personnel file. Any failure to disclose a change in medication could lead to a disciplinary meeting.

POLICY -NO SMOKING

We recognise that many people in our society smoke and we are aware that smoking is lawful and a matter of choice for adults.

However, we recognise that smoking is an activity disapproved of by many parents and to which they do not wish their child to be exposed. We recognise also that our employees have a right to expect to be able to work and have periods of rest from work in a smoke free environment.

Therefore, there will be NO SMOKING at any time in uniform, on the premises or in the presence of a child. This includes e-cigarettes

This policy applies to staff and parents and all parents are made aware of this policy when they enrol their child.

POLICY – MANAGING BEHAVIOUR

Supporting children in their behaviour is important as it encourages them to understand similarities and differences between themselves and others. Teaching them respect and tolerance. It helps them to learn right for wrong and become a valued member of their community.

Within the nursery setting we will promote and encourage positive behaviour. We will support children using techniques appropriate to their age/stage of development. All staff and adults in the setting are:

- Expected to display positive models of behaviour.
- Set clear consistent boundaries and expectations.
- Promote sharing and turn taking while encouraging children to respect others play.
- Respond to conflict in a calm consistent manner and help children to find solutions.
- Support children to understand and express their own feelings.
- Praise and encourage positive behaviour and efforts to resolve conflict.
- Support children to understand right and wrong and consider the impact their behaviour has on others.
- Promote respect for each other and value all as children as individuals.
- Provide opportunities for children to develop independence and may choices.
-

If unwanted behaviour continues we will use the 1-2-3 Magic technique.

- When unwanted behaviour is displayed, we will say and gesture to the child “stop 1” using a SHORT SIMPLE sentence that explains the behaviour that we want to stop.
- If the behaviour is repeated then we say and gesture “stop 2” and repeat the same short simple sentence.
- If the unwanted behaviour is repeated again then we say and gesture “stop 3 “and the child is moved to quiet area of the room for 2 mins(one minute for each year of their age) with a familiar adult close by.
- After this time, the child reflects on their behaviour with adult support, and returns to their play.

If a child should display behaviour that may cause harm to themselves or other or serious damage to property then it is appropriate to go straight to stop 3. When this technique has been used then parents will always be informed.

Children’s behaviour is discussed regularly with parents and when reoccurring unwanted behaviour is displayed then we work in partnership with parents and develop individual behaviour plans.

We WILL NOT

- Use techniques that threaten, frighten or humiliate a child
- Create situations that mean a child receives adult attention only as a result of unwanted behaviour.
- Remove toys because they are the focus of conflict or exclude a child from activities.
- Use physical punishment of any sort.
- Leave a child on their own.

Bullying is the persistent physical or verbal abuse of a child or adult, by a child or adult. Bullying is an intent to hurt, it is often planned and accompanied by an awareness of the impact of their behaviour on others. When bullying occurs between children we will:

- Intervene to prevent or stop harm.
- Support the child who has been bullied, recognising and acting on their concerns.
- Help the child doing the bullying to recognise the impact of their actions and explain why it was not appropriate behaviour.
- Work in partnership with parents to support both children's needs and develop an individual plan.

We do not label children as bullies, we recognise the support these children need and consider the circumstances that may have caused them to act in this negative way.

POLICY - PHYSICAL INTERVENTION

There may be occasions when it is necessary for a member of staff to restrain a child for the safety of that child or other children. Restraining a child should be a last resort and only when necessary for the safety of the child. If you need to restrain a child, you **MUST** complete the relevant form and inform the manager.

POLICY - BITING

Biting is very common in toddler and is virtually unavoidable when they are cared for in groups. Biting is a normal behaviour and is not generally a sign that there is anything wrong with the child. Children under the age of three have a limited understanding of the effects of their behaviour on others. They don't appreciate how much biting hurts; however, we need to be consistent in our to bullying at the setting. Our most important task is to help children to learn which behaviours are acceptable. When a child bites another child we:

- Say "3 No biting"
- Comfort the child who has been bitten and apply any first aid that is required.
- The child who has been bitten will be spoken to by getting down to their level using words, tone of voice and manner that communicates that this behaviour is not acceptable. This needs to be age appropriate
- Do not shout at the child and do not use the word naughty
- Remove the child from the activity and give them a short period of 'thinking time. During this time, the adult stays close by
- Speak to the child again and use age-appropriate language to explain that biting is not acceptable
- Encourage the biter to apologise to the child they hurt

An accident/incident form must be written up for both parents and an information leaflet shared with parents to give them more information.

Staff in the room must be more vigilant if a child is going through a biting stage and try to distract before they have a chance to bite. We may recommend an action plan or an ABC chart to record incidents to try and identify any triggers that we can use to support children.

POLICY - FOOD ALLERGENS

Park lane Kids Ltd will ensure all staff and volunteers comply with The Food Information Regulation. Staff will give parents and children information about the allergenic ingredients used in any food or drink provided to children and staff.

Parents provide information about any allergies or intolerances that a child may have and provide allergen information about the food you provide when they start and if it changes during their time at the setting on an 'Individual Food Allergen Plan' and kept in the room.

Children who have any allergens will have a care plan that details the signs and symptoms and what to do in the event of a reaction.

All staff must provide information that is accurate, consistent and verifiable upon challenge.

Which foods can cause allergy?

Cereals containing gluten such as wheat, rye, barley, oats, spelt or khorasan

Crustaceans for example prawns, crabs, lobster, crayfish

Eggs

Fish

Peanuts

Soybeans

Milk

Nuts such as almonds, hazelnuts, walnuts, cashews, pecan nuts, Brazil nuts, pistachio nuts, macadamia (or Queensland) nuts

Celery (including celeriac)

Mustard

Sesame seeds

Sulphur dioxide (>10mg/kg or 10mg/L)

Lupin

Mollusc for example clams, mussels, whelks, oysters, snails and squid

Procedure – Food Allergen

- The Cook and Manager Will Complete the FSA online food allergen training course
- Download a copy of the 14 allergens list from the FSA website and displayed on the notice board with a note to parents to ask the manager if they require more information.
- Email parents informing them of the new legislation and asking them to let me know if they require ingredients lists as well as attaching the 14 allergens document.
- Keep a folder of Supermarket fact sheet or labels detailing which allergens ingredients contain.
- Display information telling parents which of the 14 allergens, if any each meal contains.
- Complete an Individual Food Allergen plan for any child with allergens.
- Check the ingredients of messy play activities against children that have food allergens and complete an activity allergen content form which is displayed for parents.

PROCEDURE - ADMINISTERING MEDICATION

Staff will **NEVER** accept medicines that have been taken out of their original container as they cannot be sure what the medication contains.

Staff must not make changes to the written dosage as requested and the parent/carer must sign the form.

If a dose is missed, it is important to give a dose as soon as is realised and to inform the parents, so that they are able to continue with the medicine at home.

Only staff with a valid paediatric first aid certificate are permitted to administer medicines

All medicines are to be kept out of children's reach in an agreed place that all staff have knowledge of.

Children should not be forced to take the medication, it should be noted on the medication form and the parents contacted immediately for their advice if they refuse it.

A medication form must be completed by the member of staff, so that they check the information on the medicine label.

Children with on-going medical needs

- Parents must provide information in writing about the medical condition of any child with long-term medical needs. This information needs to be recorded on a care-plan and shared with the staff team.
- Any changes to a child's condition or medication must be put in writing by the parent, even if they tell you verbally. It is important to have this information recorded and regularly reviewed by the room leader.
- With regard to the administration of life saving medication such as insulin/adrenaline injections or the use of nebulisers, the parents can sign a general consent for staff to administer should they think the child requires.
- Non-prescription medication e.g. pain and fever relief or teething gel may be administered, but only with the prior written consent of the parent, usually given on the registration form and only when there is a health reason to do so. The member of staff in charge will make the final decision about giving the medication.
- The setting will keep a bottle of calpol on the setting to be used if a child's temperature rises over 38.5 degrees (parents must be spoken to for authorisation prior to the dosage given) or where parents have signed previous consent.
- Children under 16 are not to be given aspirin or medicines containing ibuprofen unless prescribed by a doctor

PROCEDURE - ILLNESS

If a child becomes ill while at the setting, staff will:

- Move them away from the other children and keep them comfortable
- Frequently check their temperature and make a record of it
- Monitor their illness and be aware of signs and symptoms to indicate the child's state of health
- Contact parents/carers to collect the child
- If necessary, place a notice on the door if the illness is confirmed as a contagious disease.
- If there is an outbreak of a contagious disease, then the manager must inform the Health department.

PROCEDURE - TREATING A FEVER

In children under five, a fever is considered to be a temperature of 38C (100.4F) or above. It's usually caused by a minor viral infection, such as a cough or cold. A high temperature is treated as 39C.

Symptoms of a fever may include:

- feel hotter than usual when you touch their forehead, back or stomach
- feel sweaty or clammy
- have flushed cheeks

If you suspect a child has a fever, you should check their temperature with a thermometer. If you believe they do have a fever. The initial steps to take are:

- Keep the child cool with light clothing, make sure the room is cool, give the child plenty of fluids
- Check his/her temperature every 10 minutes and make a note of the reading and time in both ears
- If the temperature reaches 38.5 degrees inform the parent and give the child fever medicine, if prescribed by the doctor or prior consent from the parent.
- Ensure there is 4 hours between any dose given at home
- There's no need to undress a child or sponge them down with tepid water. Research shows that neither actually helps reduce fever.
- If the child's temperature reaches 40 degrees call for an ambulance and inform the parents as the child may suffer a convulsion

PROCEDURE - EMERGENCY OR ACCIDENT

In the event of an emergency or accident:

- The incident must be assessed and if life threatening call for an ambulance
- The member of staff with paediatric first aid should wear protective gloves should be used at all times
- The relevant first aid appropriate to the accident should be administered
- Parents' wishes should be respected at all times with regard to cultural and religious beliefs
- If necessary, the child should be taken to the minor injury clinic at Latham House and parents informed
- The accident/incident sheet should be fully completed for all accidents/incidents including those with no visible wound and should be signed by the manager and parent
- Parents to be contacted immediately in the event of a serious injury.
- A bump note sent home for all head injuries
- All serious accidents need to be reported to Ofsted within 14 days.

PROCEDURE – NAPPY CHANGING

- Staff wash their hands prior to changing a child's nappy.
- Staff **MUST** wear disposable gloves & apron.
- Baby/toddler placed on the changing area.
- Wet/soiled nappy removed.
- Baby/child cleaned from front to back and any barrier cream applied if required.
- Wet/soiled nappies and all cleaning materials will be double bagged and disposed of in the nappy bin.
- Staff must clean the changing mat with disinfectant prior to changing the next child, to avoid cross-contamination of infection.

PROCEDURE - SLEEP CHECKS

Children and babies will have all bedding provided by the setting unless the parents request otherwise.

- Bedding is to be washed after 5 times it is used.
- Children and babies to be put to sleep on their back.
- A member of staff is to remain in the same room as sleeping children.
- Children must be physically checked every 10 minutes and the time recorded in the sleep book.
- Parent's wishes are to be respected in relation to children sleeping on mats, in cots or in pushchairs.

PROCEDURE - LATE COLLECTION

There are a number of reasons why a child may remain uncollected at the end of the day, perhaps if a parent is delayed or confused about who is collecting or about the time of collection. **Should parents/carers be delayed in the collection of a child they must call the setting.**

However, if we are not contacted and a child remains uncollected we will follow the procedure below:

The person in charge will:

- Check for any messages that have been left.
- Staff will wait 10 minutes after the end of a session and then ring the child's home and parent's mobile numbers leaving messages if necessary.
- Staff will then wait with the child for a further 10 minutes before ringing the child's emergency contact number.
- Staff will then wait for another 20 minutes before ringing First Response on 0116 305 0005.
- Staff will then follow the advice given to them by First response.
- Only an authorised person is to collect the child.
- If the authorised person informs the setting that another person is collecting the child, a name, address, physical description and password must be given.

PROCEDURE - PERSON COLLECTING THE CHILD

Children will only be released to the named persons on the registration form. If parents/carers request a different person to collect they must provide a password to be given to the staff.

PROCEDURE – MISSING CHILD

- inform the manager of the setting (or person in charge)
- immediately begin an organised search, checking all areas of the setting
- make sure that staff members communicate with each other (e.g. using mobile phones)
- supervise all the other children and make sure they are safe
- if the missing child is not found immediately, inform the parents or carers and the police
- make a full written report of the incident
- inform the relevant authorities (e.g. Ofsted).

PROCEDURE - COMPLAINTS

We aim to bring all concerns about the running of our setting to a satisfactory conclusion for all of the parties involved.

Making a complaint

- We advise any parent/carer to discuss their concerns with their child's key person or room leader.
- If this is not resolved then the complaint should be put in writing to the manager who will investigate the complaint and provide a formal response to the parent, usually in writing.
- If the parent is not satisfied with the outcome of the investigation, he or she can request a meeting with Samantha Faulkner, the managing Director, to be held within 7 days.
- An agreed written record of the discussion is made as well as any decision or action to take as a result and a copy sent to all parties.

Parents may approach Ofsted directly at any stage of this complaints procedure. In addition, where there seems to be a possible breach of the setting's registration requirements, it is essential to involve Ofsted.

The address and telephone number of our Ofsted regional centre are; -
Ofsted, Piccadilly Gate, Store Street, Manchester, M1 2WD
0300 1231231

RECORD OF COMPLAINT

A record of complaints against our setting and/or the children and/or the adults working in our setting is kept, including the date, the circumstances of the complaint and how the complaint was managed. The outcome of all complaints is recorded which is available for parents and Ofsted inspectors on request.

PROCEDURE - VISITORS

Always open the door with the latch

FOR ANY VISITOR ask for identification

Check the identification whilst the visitor stays outside

NEVER GRANT ACCESS TO ANYONE WHO IS NOT KNOWN TO YOU

ALL visitors must fill in the visitor book

A visitor's badge must be given to the visitor

NEVER LEAVE A VISITOR UNATTENDED

PROCEDURE - SECURITY

The building must be secured so that children cannot get out or any intruders enter unauthorised. The senior member of staff must complete a daily check to ensure that there have not been any breaches overnight.

Children **MUST NOT** be able to open the door on their own.

PROCEDURE -OUTINGS

Parents are asked to sign consent at the time of enrolling their child, to agree to short outings taking place without any prior notification.

There must always be a qualified member of staff (level 2) and a first aider present. The children are to wear high visibility vests/bands and the staff to wear their uniform and high visibility clothing so as to be identifiable to members of the public.

A bag is to be taken containing the following items:

- contact telephone numbers
- First aid kit
- Tissues
- Wet wipes
- Mobile phone
- Water and cups

Significant incidents need to be reported immediately on return to the manager and documented.

At no time must a member of staff leave the group.

Should a situation arise that requires assistance staff should telephone the setting for advice.

No personal mobile phones or devices are to be taken on outings.

Staff should not carry out any personal errands while responsible for any children.

Members of the public will observe staff behaviour towards the children, ability to control and motivate the children and general conduct. These observations reflect on Park Lane Kids Ltd so staff are reminded to conduct themselves professionally at all times.

OUTINGS SLIP

A general risk assessment must be carried out for trips to the park and town, however all staff **MUST** complete the outings slip with all the relevant information and record any problems along with the time back in the setting. These slips can be found in the room folder.

PROCEDURE - FIRE EVACUATION

If the setting has to be evacuated because of fire, the procedure should be as follows:

- Press the RED fire alarm button that will activate the alarm across the whole setting.
- Raise the alarm with the fire brigade by telephoning 999 (or 112).
- If possible, close all windows and doors as you leave the building, to minimise the spread of the fire.
- Remain calm and reassure the children.
- Evacuate the children from the building, following the procedure of the setting, including specific procedures for infants or children with special needs.
- Do not return to the building until authorised to do so.

PROCEDURE – EMERGENCY CLOSING

In the event of a breakdown of essential services (e.g. heating failure, loss of water supply), severe weather conditions or where the nursery has to close or partially close due to an illness epidemic, it is important that you are familiar with the following procedures: -

- The children's health and safety is of paramount importance.
- If the situation is life threatening the children will be evacuated to a safe place.
- Where the nursery has been closed due to heating failure, loss of water supply or where the nursery has an illness epidemic, the manager will phone the parents to arrange collection
- We will make every effort to stay open as normal through adverse weather conditions.
- Ofsted to be informed on 0300 1231231

POLICY - EQUAL OPPORTUNITIES & DIVERSITY

No child, individual or family will be excluded from the setting or activities on grounds of age, gender, sexuality, class, family status, means, disability, colour, ethnic origin, culture, religion or belief in accordance with current legislation and guidance:

Disabled Persons Act 1958, 1986, Race Relations Act 1976, Sex discrimination Act 1989
Children Act 1989.

We believe that all the activities should be open to all children and families, and to all adults committed to their welfare. We aim to ensure that all who wish to work in, or volunteer to help with, our settings have an equal chance to do so.

We will:

- Celebrate and respect diversity in the immediate and wider society
- Ensure all children, staff and parents feel valued
- Ensure all children are included and feel good about themselves
- Resources reflect diversity
- Treat all children with individual and equal concern

Multicultural activities are included in our setting to enhance children's awareness and understanding of the multicultural society we live in. These include:

- Trips to Melton Road in Leicester to see how Diwali is celebrated, children experience Indian sweets, clothes and meet Children from another pre-school.
- An introduction to Polish through fun language sessions and trips to explore the Polish shops and church in our town.
- Parents from different ethnic backgrounds are invited to the setting to read stories in different languages, share foods and talk about different countries.
- Children share postcards from their holidays and gain a wider understanding on a map about where they have been and talk about what they saw.
- We provide appropriate art materials so that children can colour people with different faces.
- Books are used at circle time and small groups to teach children about diversity, internet safety, bullying, people who help us and disabilities.

POLICY - SPECIAL EDUCATIONAL NEEDS

Each setting will have a named SENCo whose responsibilities include:

- Encouraging all staff to be familiar with the SEN Code of Practice and policy
- To encourage parents, particularly those with children with SEN, to read this policy and to ask the SENCo questions about it.
- To review and monitor this SEN Policy.
- Encourage staff to bring concerns about children to herself as SENCo, with their dated observations.
- To assist staff in implementing strategies when working with children
- To support staff in their understanding of graduated response and in the writing and reviewing of Individual Education Plans (IEP's)
- To identify and bring about changes needed in the environment and source any specific resources required.
- To ensure that thought is given to making outings accessible to children with SEN.
- To ensure that positive images of disability are displayed in the setting and can be found in the books and resources the children have regular access to.
- To seek out and identify training courses that will benefit staff working with children with SEN.

ADMISSIONS ARRANGEMENTS

Where a child has a Special Educational Need that has already been identified, parents will be invited into the setting or visited in their home in the term before starting at the setting. They will meet the key person and the SENCO and discuss the needs, likes and dislikes of their child. During this meeting we will assess whether we need to acquire resources to ensure the children feel confident and independent.

If the child has a portage worker it is useful if they can be present at and contribute to the meeting.

POLICY - TRANSPORTATION OF CHILDREN

- Each vehicle will be owned by the company and have a full service history and MOT
All insurance will be fully comprehensive.
- A folder is to be held at Woodlands containing the following information:
- A copy of each person's driving license (paper and card)
- A copy of the vehicle insurance, Vehicle MOT, Service history
- There needs to be a first aid bag and fire extinguisher in the vehicle at all times and the drivers MUST have a mobile phone with credit

All staff will have an induction with the manager before driving independently and have the following responsibilities

- To sign in on the daily register
- To sign in the start mileage
- To walk around the vehicle to check it is in full operational order
- To empty the vehicle of all personal belongings and rubbish
- To sign out and record the end mileage
- To wear a high visibility vest

Staff may use their own vehicle for the purpose of work as long as:

- They have business use added to their insurance policy, for which the company will cover the cost and a copy of this kept on file
- A copy of a valid MOT certificate kept at work
- Seat belts fitted in the car

PROCEDURE - RISK ASSESSMENT

At Park Lane kids Ltd we use five simple steps to assess risks:

- Identify the hazards
- Decide who might be harmed and how
- Evaluate the risks and decide on the precautions
- Record our findings and implement them
- Review our assessment and update as necessary

The setting manager is responsible for conducting the risk assessment for the building, transport and local outings. It is important to get the balance right between carrying out suitable risk assessment procedures to protect the children from harm or injury yet allowing them to be active, to learn and to take calculated risks.

We complete the following risk assessments as a minimum:

- A general risk assessment has been carried for the setting and will be reviewed every 12 months
- A risk assessment has been carried out on the company vehicles used to transport children.
- Risk assessments have been carried out for the main places visited on outings and followed up with an outings slip to be completed before each outing.
- Any booked trips require a full risk assessment to be carried out by the setting manager.

POLICY - SHARING INFORMATION

We need to share information with parents/carers

- Information about the setting will always be available to parents through the policies, prospectus, notice board, newsletters and website.
- Information about the activities and child development
- Information including photos of the staff with details of the qualifications will be available in the main entrance.
- Copies of menus and changes to food will be given out each term and be on display in the room.
- Policies and procedures are available on request and a copy available in each room
- There will be a poster on display informing parents how to complain.
- Each family will have a key person who can develop a trusting relationship with the child offering him/her security. The key person will share a two-way diary system and share developmental records with parents - these will remain confidential between pre-school staff and family.

The setting will share information about a child's progress with any other settings that the child attends, this will ensure continuity of teaching and learning and have a positive impact on the child's development. The key person needs to provide an overview of the child's development, next steps and interests and work together in the best interest of the child.

Information will always be shared with other professionals for the safety of the child.

PROCEDURE – RETENTION PERIODS FOR DOCUMENTS

CHILDREN'S RECORDS	Where stored	For How long
Application forms	In the loft Archive box with each year and child records filed in the year of their birth. All docs tied together with treasury tag.	25 years Ofsted say 2 years
Medication		
Accident		
Register	In loft archive box per year	
STAFF RECORDS		
Personnel files, including supervision/disciplinary	In the loft Archive box with year and staff records filed in the appropriate box for the year they left our employment. All docs tied together with treasury tag.	6 Years after left unless concerns about their suitability.
Registers		
Accident		
Medication		
Staff documents if they are unsuitable		Until the adult reaches retirement age or 10 years if that is longer
DBS certificate		Destroyed after 6 months
Wages excel sheet	On live drive - archive	
Complaints		
Record of complaint and letters	Stay in the folder in the office	4 years from date of complaint
Child protection		
Child protection records	Keep the original and transfer a copy with the child when they move on. Archive box with year and child protection records filed in the appropriate box for the year we last had contact with the child. All docs tied together with treasury tag.	6 years after last contact with child
FEEE	Kept in the office and shredded after 12 months	No requirement
Risk Assessments	If any changes because of an incident, store a copy with child records. Store on live drive in archive folders.	None.

POLICY - CONFIDENTIALITY

The settings work with children and families will sometimes bring us into contact with confidential information. A confidential record of all children's details is kept by the Pre-school & Nursery in a locked file. It contains such information as telephone number and emergency contact and up to date medical information.

PLEASE INFORM THE MANAGER OF ANY CHANGES IMMEDIATELY.

To ensure all those using the setting can do so with confidence, we will respect confidentiality in the following ways:

STATEMENTS OF INTENT:

The child's carers will have ready access to the files and records concerning their own child, but will not have access to information about any other child.

Staff will not discuss individual children, other than for purpose of curriculum planning or group management, with people other than the child's own carers and sign a declaration to that effect.

- Information given to the manager, key worker or assistants will not be passed on to other adults without permission.
- Issues concerning the employment of staff, voluntary or paid will remain confidential to those directly involved in making personnel decisions on behalf of the Pre-school & Nursery
- Any anxieties/evidence relating to a child's personal safety will be kept in a confidential file and will not be shared within the group except with the manager or key worker and if appropriate other child care professionals.

The above statements are subject to the paramount commitment of the Pre-school & Nursery, which is the safety and well-being of the child. Please also see our policy on Safeguarding Children.

POLICY BABYSITTING

Park lane Kids Ltd does not provide a babysitting service outside of operational hours. However, we do understand that parent/carers sometimes ask nursery staff to babysit for their children, and this policy has been implemented to ensure clear understanding and clarification of some points regarding private arrangements between staff and parent/carers.

The nursery is not responsible for any private arrangements or agreements that are made and out of hours arrangements must not interfere with a staff member's employment at the nursery.

Our confidentiality policy must be adhered to at all times. This includes having regard for the children, other parent/carers, other staff as well as the nursery business itself.

Parent/carers should be aware that other adults accompanying the staff babysitter may not have a relevant DBS clearance, and it may not be appropriate for them to care for children.

Park Lane Kids Ltd will not be held responsible for any health and safety or any other issues that may arise from these private arrangements. Whilst in our employment, all staff are subject to ongoing supervision, observation and assessment to ensure that standards of work and behaviour are maintained in accordance with our policies. We have no such control over the conduct of staff outside of their position of employment and our duty to safeguard children as above, therefore does not extend to private arrangements.