



# ABA Horizons LTD Safeguarding Policy

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Designated Safeguarding Lead: Jamie Spencer

Safeguarding and child protection is everyone's responsibility. This policy applies to all staff, volunteers and Trustees of ABA Horizons LTD and is consistent with the procedures of the local safeguarding board.

## Legislation and regulation

- This policy is based on the Department for Education's statutory guidance, Keeping Children Safe in Education 2019 and Working Together to Safeguard Children, and the Governance Handbook.
- This policy meets requirements relating to safeguarding and welfare in the statutory framework for the Early Years Foundation Stage. This policy is also based on the following legislation:
  - Section 175 of the Education Act 2002, which places a duty on schools and local authorities to safeguard and promote the welfare of pupils
  - The School Staffing (England) Regulations 2009, which set out what must be recorded on the single central record and the requirement for at least one person on a school interview/ appointment panel to be trained in safer recruitment techniques
  - Part 3 of the schedule to the Education (Independent School Standards) Regulations 2014, which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school

A.

The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children

Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18  
Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM

The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children

Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children

Statutory guidance on the Prevent duty, which explains schools' duties under the

Counterterrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism

Statutory guidance, introduced in 2019, that specifically focuses on the criminal acts of Upskirting and Serious Violence

### Safeguarding

At ABA Horizons LTD, we are committed to doing all we can to safeguard and promote the welfare of children. We aim to provide a safe, secure and supportive environment for all members of our community but especially our children. Our aim is to create a culture of vigilance in safeguarding matters.

Keeping Children Safe in Education, September 2019 defines safeguarding and promoting the welfare of children as: protecting children from maltreatment; preventing impairment of children's 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.

Child protection is part of safeguarding and promoting the welfare of children. Child protection refers to the activity that is undertaken to protect specific children who are suffering or are likely to suffer significant harm. (Working Together to Safeguard Children 2019, Appendix A) Child Abuse is defined in Keeping Children Safe in Education, September 2019 and states that: abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another. The designated safeguarding lead (and DSPs) are most likely to have a complete safeguarding picture and to be the most appropriate person to advise on the response to safeguarding concerns.

From September 2019, specific regard to the new guidance that focuses on three safeguarding partners (the local authority; a clinical commissioning group for an area within the local authority; and the chief officer of police for a police area in the local authority area) who will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs.

There are a number of categories of child abuse:

- Physical abuse – which may involve the hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
- Emotional abuse – the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.
- Sexual abuse and exploitation – involves forcing or enticing a child to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include noncontact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities,

encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator, it may or may not, be accompanied by violence or threats of violence. The abuse can be one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation may occur without the child's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media). Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

- Neglect - which is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development.
- Children Who Go Missing From Home or Care are particularly vulnerable and may be at significant risk at times. The immediate risks associated with going missing include:

- o No means of support or legitimate income – leading to high risk activities
- o Involvement in criminal activities
- o Victim of Abuse
- o Victim of crime, for example through sexual assault and exploitation
- o Alcohol/substance misuse
- o Deterioration of physical and mental health
- o Missing out on schooling and education
- o Increased vulnerability

- Longer-term risks include:
  - o Long-term drug dependency / alcohol dependency
  - o Crime
  - o Homelessness
  - o Disengagement from education
  - o Child sexual exploitation
  - o Poor physical and/or mental health.

- Children Missing from Education: all children, regardless of their circumstances, are entitled to a full-time education which is suitable to their age, ability and aptitude and any special educational needs they may have. A child going missing from education, or not attending it regularly, is a potential indicator of abuse or neglect. We will follow the required procedures for unauthorised absence and for dealing with children who go missing from education, including appropriate notification to the Local Authority. We will also ensure staff are alert to the potential risks of poor or non-attendance and cessation of attendance, including the signs to look out for and triggers to be aware of when considering the risks of potential concerns such as travelling to war zones, FGM and forced marriage. In the event that attendance is not reported by parents, we will contact the emergency contacts for the pupil.

- Serious Violence: All staff should be aware of indicators, which may signal that children are at risk from, or are involved in serious violent crime; they should also be aware of the associated risks and understand the measures in place to manage these. These may include: increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries; Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with individuals associated with criminal networks or gangs. Advice is provided in the Home Office's Preventing youth violence and gang involvement and its Criminal exploitation of children and vulnerable adults: county lines guidance.

- Peer on Peer abuse: This places a responsibility of all staff to know what to look for in the early identification of peer-on-peer abuse and preventing it from escalating. Behaviour management practices across the services are design to work to prevent all forms of bullying, and include the expectation upon staff to staff challenge inappropriate behaviours between pupils by, for

example: making clear that sexual violence and sexual harassment is not accepted, will never be tolerated and is not an inevitable part of growing up Not tolerating or dismissing sexual violence or sexual harassment as 'banter', 'part of growing up', 'just having a laugh' or 'boys being boys'

- Female Genital Mutilation: The Mandatory Reporting Duty Female genital mutilation (FGM) is a collective term for procedures which include the removal of part or all of the external female genitalia for cultural or other non-therapeutic reasons. The procedure is typically performed on girls aged between 4 and 13, but in some cases, it is performed on young women before marriage or pregnancy.

FGM has been a criminal offence in the UK since the Prohibition of Female Circumcision Act (1985) was passed. The Female Genital Mutilation Act (2003) replaced this Act and makes it an offence for UK nationals or permanent UK residents to carry out FGM abroad, or to aid, abet, counsel or procure the carrying out of FGM abroad, even in countries where the practice is legal. Staff should be aware of risk factors and must respond to the statutory duty placed upon them in Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) to report to the police if they have reason to believe FGM has been carried out on a girl under the age of 18 either in this country or abroad. Staff who fail to report such cases will face disciplinary sanctions. Staff should still consider and discuss any such cases with the DSL and involve children's social care as appropriate (KCSiE, 2019).

- Upskirting: This is a criminal offence in England and Wales with offenders facing up to two years in prison for taking an image or video under somebody's clothing. It is usually performed in a public place, such as on public transport or among crowds of people, making it harder to spot people taking the photos and there have also been instances of the practice taking place in schools. Staff need to be extra vigilant where pupils are using ipads, 'phones with camera, and other recording devices in and around the school. Similarly, when supporting pupils outside of school, staff should maintain a conscious awareness of potential perpetrators

Child criminal exploitation: county lines

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered.

Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child (male or female) under the age of 18 years;
- can affect any vulnerable adult over the age of 18 years;
- can still be exploitation even if the activity appears consensual;
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- can be perpetrated by individuals or groups, males or females, and children or adults; and
- is typified by some form of power imbalance in favour of those perpetrating the exploitation.

Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

Specific safeguarding issues

All staff should have an awareness of safeguarding issues - some of which are listed below. Staff should be aware that behaviours linked to the likes of drug taking, alcohol abuse, truanting and sexting put children in danger.

- bullying including cyberbullying
- children missing education
- child missing from home or care
- child sexual exploitation (CSE)
- criminal exploitation: county lines
- domestic violence

- drugs
- fabricated or induced illness
- faith abuse
- female genital mutilation (FGM)
- forced marriage
- gangs and youth violence
- gender-based violence/violence against women and girls (VAWG)
- hate
- mental health
- missing children and adults strategy
- private fostering
- preventing radicalisation
- relationship abuse
- sexting trafficking
- Upskirting
- Serious violence
- Peer on Peer abuse

All staff should be aware safeguarding issues can manifest themselves via peer on peer abuse. This is most likely to include, but not limited to: bullying (including cyber bullying), gender based violence/sexual assaults, physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm, sexting and initiation/ hazing type violence and rituals. Should staff members have any concerns about peer on peer abuse, they can raise concerns through the online reporting system: CPOMS. If any concerns regarding peer on peer abuse is reported via CPOMS, both the victim and the perpetrator will be supported to understand what has occurred and the implications that it has for each individual.

The PSHE curriculum teaches pupils how to positively interact with their peers, which includes how to be kind to one another. Throughout 2019/2020, Tram House and Park House School will review and formulate its strategy to meet the requirements, from 2020, of the forthcoming changes to Personal, Social, Health and Economic (PSHE) education which means that subjects specific to age groups will become mandatory in. From September

2020 schools that operate under the DFE will be required to teach PSHE subjects and have regard to the statutory guidance. PSHE subjects should be taught following the principles of keeping children safe and prepare children for the world they are growing up in. The content should always be age appropriate.

Child abuse occurs in all groups within society, across all cultural, ethnic and religious communities and all socio-economic groups.

Safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside the school or college. All staff, but especially the designated safeguarding lead should be considering the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare. Children's social care assessments should consider such factors so it is important that as a school we are able to provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and the full context of any abuse.

We recognise that children with disabilities or additional needs may be more vulnerable to abuse as additional barriers can exist when recognising abuse and neglect. This can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- Children with SEN and disabilities can be disproportionately impacted by things like bullying – without outwardly showing any signs; and
- Communication barriers and difficulties in overcoming these barriers.
- Being more prone to peer group isolation than other children

Our staff and volunteers form part of the wider safeguarding system for children. Safeguarding and promoting the welfare of children is everyone's responsibility (see Duty of Care).

Staff need to use the pupils' preferred method of communication in order to elicit as much information from the pupils' as possible. Staff need to be aware that disclosures may or may

not be verbal and need to be vigilant to any change in behaviour patterns, verbal or otherwise. If staff do not feel confident in eliciting information from pupils, they should immediately seek the support and guidance from more senior members of staff.

The Children Act 2004, Section 11 contains arrangements required to safeguard and promote the welfare of children including:

- A clear statement of the agency's responsibilities towards children available to all staff.
- Staff training on safeguarding and promoting the welfare of children for all staff working with or in contact with children and families.
- Safer recruitment procedures in place.
- Effective inter-agency working to safeguard and promote the welfare of children.
- Effective information sharing.

Information sharing:

Information sharing is vital in identifying and tackling all forms of abuse. Whilst, among other obligations, the Data Protection Act 2018 places duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure, this is not a barrier to sharing information where the failure to do so would result in a child being placed at risk of harm. Fears about sharing information cannot be allowed to stand in the way of the need to promote the welfare and protect the safety of children.

We will request a minimum of two emergency contact numbers for each child, preferably three, as we acknowledge that this is a protective measure for children to enable swift contact with families when necessary.

Working Together to Safeguard Children 2019 is statutory guidance for interagency working to safeguard and promote the welfare of children.

Keeping Children Safe in Education, September 2019 sets out the statutory duties of staff and governing bodies / proprietors to safeguard and promote the welfare of children.

Duty of Care:

Duty of Care means that everyone is required to take reasonable care in any situation in which harm to someone else could be foreseen.

A Higher Duty of Care which is the standard of care expected from someone with increased experience and specialist expertise where, through training or experience, one may be expected to visualise more clearly the results of one's actions in one's area/s of specialism. This applies specifically, but not exclusively, to Designated Safeguarding Leads.

Negligence and Duty of Care:

Acts or omissions by someone with a duty of care in which this is breached by falling below the standard of care required in the circumstances to protect others from the unreasonable risk of harm.

## B. A safe culture

### 1. Recruitment

When ABA Horizons LTD appoints new staff there are several checks made which aim to prevent unsuitable people from working with our children. These include:

- We ask to see proof of identity by looking at an original birth certificate, driving licence or passport.
- Where relevant, we seek proof of professional qualifications by asking to see the original certificate or diploma.
- References are taken up before interview; we require the names of two referees that we contact. We obtain two written references one of which must be from the current or most recent employer.
- In principle, no member of staff (whether paid or unpaid) in regulated activity at ABA Horizons LTD will be permitted to start work until an enhanced DBS check has been undertaken. We accept that it is legally permissible for staff to commence work whilst waiting for an enhanced DBS to be completed so long as a Barred List check has been and will in exceptional circumstances permit this to happen with a full risk assessment agreed with the employee.

2.

• We also have a legal duty to make a referral to the DBS under specific circumstances, and we believe a person has caused harm or poses a future risk of harm to vulnerable groups, including children.

Training of staff

All members of staff (including teaching and non-teaching) receive training on safeguarding and child protection. The training includes basic concepts of child protection, recognition and handling a disclosure, which may or may not be verbal. Training will also include the company's behaviour policy and procedures for children missing education as well as the staff code of conduct and this CP / safeguarding policy.

Safeguarding and Child Protection Awareness Training is delivered as part of the induction programme and as a refresher every year to all staff, including DSLs and DSPs. (This includes identifying the DSPs and DSLs)

Additional training sessions are delivered by an external consultant to cover specific safeguarding topics annually. These topics can include but are not limited to:

- Adult Safeguarding and Mental Capacity Act
- Prevent Duty, FGM and Ethnic Diversity
- Key Changes to 'Keeping Children Safe in Education'

The DSP's and DSLs attend Level 3 training every 2 years. DSL training is accessed through Child Protection Training UK and Wandsworth Children Safeguarding Board.

All staff members are required to read the Intimate Care Policy as part of induction training. Each child's individual care plan is incorporated in their behaviour plan and pupil profile sheets along with individual risk assessments.

3.

Training Objectives

To ensure that ABA Horizons LTD team members observe and monitor clients' routine behaviour on a regular basis.

To ensure staff across the organisation understand their responsibility to raise concerns and how they can raise concerns.

To support staff members in recording of observations so that any confidential information pertaining to a child is precise, objective and professionally documented. To handle information in a sensitive and confidential way and on a "need to know" basis referring to the latest Government guidance Information Sharing 2018, as necessary.

To ensure that referrals are handled correctly and consistently.

To serve as a reminder to staff members to remain alert and aware of child protection issues.

To identify the safeguarding and child protection leads across the organisation

The safeguarding and protection leads have full training in child protection, safeguarding and multi-agency working which is refreshed at least every two years. All other staff receive annual training in child protection and/or safeguarding.

Refresher training for all staff is also delivered throughout the year.

4.

• Annual staff training will also include information on peer-to-peer abuse, Honour Based Violence, Female Genital Mutilation and Preventing Radicalisation. (see section 11 for further information)

Roles and responsibilities

Designated Safeguarding Lead (DSL)

The designated safeguarding lead is expected to:

- The Designated Safeguarding Leads (DSL) will have their role explicitly stated in their job descriptions and will be released to attend the necessary enhanced training courses to enable them to carry out their role effectively.
  - Designated leads will also ensure that all staff are provided with Part One of Keeping Children Safe in Education 2018 guidance and assisted to understand and discharge their roles and responsibilities as set out in this guidance.
  - Refer cases of suspected abuse to the local authority children's social care as required;
  - Support staff who make referrals to local authority children's social care;
  - Refer cases to the Channel programme where there is a radicalisation concern as required;
  - Support staff who make referrals to the Channel programme;
  - Refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
  - Refer cases where a crime may have been committed to the Police as required.
  - Liaise with the Heads of Schools to inform them of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
  - As required, liaise with the "case manager" and the designated officer(s) at the local authority for child protection concerns (all cases which concern a staff member); and
  - Liaise with staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies. Act as a source of support, advice and expertise for staff.
  - Ensure the child protection policies are known, understood and used appropriately;
  - Ensure the child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this;
  - Ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the organization in this; and
  - Link with the local LSCB to make sure staff are aware of training opportunities and the latest local policies on safeguarding.
  - To lead on termly internal safeguarding supervision Deputy Designated Safeguarding Lead (DDSL)
- The designated deputy safeguarding lead is expected to:
- Deputise for a Designated Safeguarding Lead and undertake directed tasks as warranted by the DSL. The Deputy Designated Safeguarding Leads (DDSL) will have their role explicitly stated in their job descriptions and will be released to attend the necessary enhanced training courses to enable them to carry out their role effectively.
  - Deputy Designated leads will also assist in ensuring that all staff are provided with Part One of Keeping Children Safe in Education 2018 guidance and assisted to understand and discharge their roles and responsibilities as set out in this guidance.
  - Refer cases of suspected abuse to the local authority children's social care as required;



- Support staff who make referrals to local authority children's social care;
- Refer cases to the Channel programme where there is a radicalisation concern as required;
- Support staff who make referrals to the Channel programme;
- Refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
- Refer cases where a crime may have been committed to the Police as required.
- Liaise with the Heads of Schools or Heads of Services (as they apply) (This are Designated Safeguarding Leads) to inform them of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- As required, liaise with the "case manager" and the designated officer(s) at the local authority for child protection concerns (all cases which concern a staff member); and
- Liaise with staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies. Act as a source of support, advice and expertise for staff.
- Ensure the child protection policies are known, understood and used appropriately;
- Ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the organization in this; and
- To engage with termly internal safeguarding supervision  
The DSL will undergo training to provide them with the knowledge and skills required to carry out the role, updated at least every two years and will include Prevent awareness training  
Designated Safeguarding Person (DSP)

The designated safeguarding person works with the DSL to ensure the effective management and response to concerns raised within the organisation. The DSP is a key point of contact, ensuring that records are accurate; and that actions are taken and reported to the DSL. Should the DSLs be unavailable, the DSPs would deputise on their behalf.

DSP's should update incidents/injuries in the relevant category on CPOMS. Similarly the reason given for the incident/injury should be recorded and witnessed. The record should show times and dates of any such observations and conversations with parents/carers. This accounts should be written up promptly. A chronology for each child is automatically generated for a pupil on CPOMS after the first incident and is only accessible to DSPs and DSLs.

Observation and monitoring is particularly important for children with learning and/or communication challenges as they may not be able to verbally disclose an experience of abuse and it is more likely to be as a result of a member of staff being vigilant and noticing unusual behaviour or marks or bruises.

Any child may benefit from early help, but all staff should be particularly alert to the potential need for early help for a child who:

- is disabled and has specific additional needs;
- has special educational needs (whether or not they have a statutory education, health and care plan);
- is a young carer;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
- is frequently missing/goes missing from care or from home;
- is misusing drugs or alcohol themselves;
- Is at risk of modern slavery, trafficking or exploitation;
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;

- has returned home to their family from care;
- is showing early signs of abuse and/or neglect;
- is at risk of being radicalised or exploited;
- is a privately fostered child.

In addition to monitoring and recording signs or indicators of abuse, all staff have a responsibility to pass on ANY concerns at the earliest opportunity, in order that early help can be offered to the child and/or their family to reduce the risk of problems escalating.

The Department of Education has provided advice What to do if you are worried a child is being abused March 2015 for practitioners.

Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead professional. Any such cases should be kept under constant review and consideration given to a referral to children's social care for assessment for statutory services if the child's situation does not appear to be improving or is getting worse.

## 6. Procedures for reporting

Allegations against staff are to be dealt with in accordance with section 7 below.

Issues to report are any concerns regarding the safeguarding or welfare of children. Concerns will include any incident that could have a bearing on the welfare of a child as well as signs or indicators of abuse, disclosures from children or their parents/carers or concerns about the interaction of any person in contact with a child. Any information is handled in a sensitive and confidential manner on a "need to know" basis.

If the child discloses sexual abuse and/or if a member of staff observes signs that are consistent with such abuse, that disclosure should not usually be shared with the parent/carer at that point, in case the parent or carer may be the perpetrator. The staff member should inform the DSP or DSL who will inform Child Social Services immediately and a record will be made on CPOMS.

### Children's Board Procedures.

So-called 'honour-based' violence (HBV) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so called HBV are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubts staff should speak to the designated safeguarding lead. If it is discovered that a pupil has been a victim of FGM, it is the discovering staff's duty to report it to the police.

Staff working with children are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff should always act in the best interests of the child.

Knowing what to look for is vital to the early identification of abuse and neglect. If staff are unsure, they should always speak to the designated safeguarding lead (or the DSP for their class).

## 7. Allegations against staff or volunteers

If an allegation is made against any member of staff or volunteer, the relevant director should be informed immediately. The director will then discuss the allegation with the LADO (Local Authority Designated Officer) the same day before discussing the allegation with the member of staff or taking any decision regarding action including whether the staff member should be suspended. The LADO will advise whether a multi-agency meeting is to be convened.

If an allegation is made against the director, it is the responsibility of another director to notify the LADO.

Allegations against staff must be managed in accordance with Part Four of Keeping Children Safe in Education, September 2018.

## 9. Effective Reporting

An incident report is completed whenever there is a concern regarding the safeguarding or welfare of children no matter how small and even if no further action is required. This electronic system is available to all staff who work for ABA Horizons LTD via Ashley Wells (director) failing this, they can be found on Trello and Sharefile. Incident reports when used to report a concern are confidential and only directors and senior management have access to confidential information. Incident reports must be written as soon as possible after an incident, but definitely before the end of the day in which the concern is raised, and a senior management notified at a minimum, at the time. Historic Cause for Concern forms are kept in locked files, which only the safeguarding team have access to.

Careful records must be kept of all action taken concerning an incident, for example time, date, and name of Duty Social Worker, when reporting suspected child abuse. These records must be kept confidential.

Referral reports, using the relevant Local Authority's own referral form are written by the DSP/ DSL and it is their responsibility to ensure that a copy of this report is kept in the Child Protection server on the school's computer system. The relevant referral form for each borough is generally available on the boroughs' websites, alternatively the duty social worker will direct the director/ senior manager to the referral form that they need to complete and the email address that the referral forms are sent to.

Only directors and senior managers have access to the Child Protection drive on the school's computer systems.

## 10. Referral

ABA Horizons LTD Services have a duty to report suspected child abuse to our statutory partner agencies.

Any member of staff who has reason to suspect possible abuse, or to be concerned about whether a child is likely to suffer significant harm has a responsibility for raising the issue with the DSP – and by completing an incident report on CPOMS (<https://ABA Horizons LTD.cpoms.net>) It is the DSP's responsibility to advise staff and where necessary telephone social services for further advice.

If the protection concern relates to events elsewhere, specifically the pupil's home, then the reporting route is to that home authority.

It is also our duty to inform Child Social Services of possible abuse. DSP's have specific training in child protection, safeguarding and referral procedures. However, if any member of staff believes that their concerns are not being taken seriously and that steps are not being taken to protect a child, the member of staff with the concern MUST escalate this to one of the other DSP's, the DSL, or the CEO/nominated Trustee for safeguarding. If necessary, any member of staff can make a referral to Social Services in line with Keeping Children Safe in Education September 2019 but they should inform the relevant director/DSL as soon as possible that a referral has been made. If in doubt, ask.

We also expect staff to be vigilant against female genital mutilation (FGM), particularly for female pupils from communities which are known to be most at risk. In the event of any indications that a pupil may be at risk of FGM staff have a mandatory duty to report it. Staff must personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the staff member has a good reason not to, they should also still consider and discuss any

such case with the designated safeguarding lead and involve children's social care as appropriate. Further information about FGM is available within Keeping Children Safe in Education, September 2019 in Annex A from page 53\* onwards including 'indicators', 'actions' and the mandatory reporting duty.

Whilst it is less likely to be relevant to our cohort of pupils, compared with those of a mainstream school, we have a duty to prevent the radicalisation of pupils under the Counter- Terrorism and Security Act. This is often referred to as the 'Prevent duty'.

Further information is found at page 62\* onwards of Keeping Children Safe in Education, September 2019 which includes information on when referrals to the Channel programme may be required. \*May change subject to final publication

Staff should also, be aware, for the cohort of children in the area, of the potential for faith abuse and fabricated or induced illness to occur. In respect of the latter staff may wish to refer to our

Medical Policy which deals with situations pertaining to the administering of prescribed medicines and requests to administer other substances including but not limited to food supplements.

The company has a mandatory duty to report any instances or suspected instances of 'private fostering' to the relevant local authority. A private fostering arrangement is one which has been made privately (without the involvement of the local authority) for the care of a child under the age of 16 years (under 18, if disabled) a parent or close relative, in their own home, with the intention that it should last for 28 days or more. (Close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step- parents; it does not include great-aunts or uncles, great grandparents or cousins.) If it is deemed that a private fostering arrangement is in place, the school should then notify the local authority to allow the local authority to check the arrangement is suitable and safe for the child.

In an acute emergency when the child's life and health seem seriously at risk, dial 999 and call for an ambulance. The Metropolitan Police Child Protection Team should be contacted, as well as the local areas social services.

### C. Resources

London Child Protection Procedures, 2018 (update planned for Autumn 2019)

Available as hard copy in each school, also available electronically via Wandsworth Safeguarding Board website [www.wscb.org.uk](http://www.wscb.org.uk) and London SC website – [www.londonscb.gov.uk](http://www.londonscb.gov.uk).

London Safeguarding Children Board supplementary procedures

These provide detailed information related to specific safeguarding issues. They are available via the London SCB website (as above)

Inspecting Safeguarding in Early Years, Education and Skills (September 2019)

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/800586/Inspecting\\_safeguarding\\_.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/800586/Inspecting_safeguarding_.pdf)

Keeping children safe in education (until 31st August 2018)

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/526153/Keeping\\_children\\_safe\\_in\\_education\\_guidance\\_from\\_5\\_September\\_2016.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/526153/Keeping_children_safe_in_education_guidance_from_5_September_2016.pdf)

Keeping Children safe in education (From 1st September 2019)

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/811513/DRAFT\\_Keeping\\_children\\_safe\\_in\\_education\\_2019.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/811513/DRAFT_Keeping_children_safe_in_education_2019.pdf)

Childcare Act 2006 – Statutory Guidance February

2015, amended 10 September 2018 [http://www.legislation.gov.uk/ukpga/2006/21/pdfs/ukpga\\_20060021\\_en.pdf](http://www.legislation.gov.uk/ukpga/2006/21/pdfs/ukpga_20060021_en.pdf)

Working Together to Safeguard Children 2018

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/419595/Working\\_Together\\_to\\_Safeguard\\_Children.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/419595/Working_Together_to_Safeguard_Children.pdf)

What to do if you're worried a child is being abused, 2015

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/419604/What\\_to\\_do\\_if\\_you\\_re\\_worried\\_a\\_child\\_is\\_being\\_abused.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/419604/What_to_do_if_you_re_worried_a_child_is_being_abused.pdf)  
Information sharing - Advice for practitioners providing safeguarding services to children, parents and carers, 2018 [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/419628/Information\\_sharing\\_advice\\_safeguarding\\_practitioners.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/419628/Information_sharing_advice_safeguarding_practitioners.pdf)  
Use of reasonable force: advice for HTs, staff and governing bodies (DfE 2012)  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/444051/Use\\_of\\_reasonable\\_force\\_advice\\_Reviewed\\_July\\_2015.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/444051/Use_of_reasonable_force_advice_Reviewed_July_2015.pdf)  
Safeguarding Disabled Children, Practice Guidance, July 2009  
<https://www.gov.uk/government/publications/safeguarding-disabled-children-practice-guidance>

3. Safeguarding Standards Service, London Borough of Wandsworth  
(Manager: Sharon Stockman)  
Principal administrator: Jackie Reynolds WSCB development manager
4. Metropolitan Police Child Protection Team, Wandsworth, Merton & Kingston
5. Wandsworth Social Services Department Referral and Assessment Service (duty SW)  
Monday to Friday 9am-5pm
6. The NSPCC Whistle Blowing Helpline

Out of hours:

1. Wandsworth Social Services Department
2. Metropolitan Police Child Protection Team,  
020 8871 7208 020 8871 8610  
020 8247 7840 0208 871 6622  
0800 028 0285  
020 8871 6000 020 8247 7840

In an acute emergency when the child's life and health seem seriously at risk, call 999 for an ambulance.

Revised: July 2019 based on changes to KCSIE (2019) Last review: September 2018

Date of next review: July 2020

Review group: Trustees

Appendix 1: guidance regarding potential signs of abuse from London SCB procedures

Recognising Physical Abuse

The following are often regarded as indicators of concern:

- An explanation which is inconsistent with an injury
- Several different explanations provided for an injury
- Unexplained delay in seeking treatment
- The parents / carers are uninterested or undisturbed by an accident or an injury
- Parents are absent without good reason when their child is presented for treatment
- Repeated presentation of minor injuries (which may represent a 'cry for help' and if ignored could lead to a more serious injury.
- Family use of different doctors and A&E departments
- Reluctance to give information or mention previous injuries

Bruising

Children can have accidental bruising, but the following must be considered as non-accidental unless there is evidence or an adequate explanation provided:

- Any bruising to a pre-crawling or pre-walking baby
- Bruising in or around the mouth, particularly in small babies which may indicate force feeding
- Two simultaneous bruised eyes, without bruising to the forehead (rarely accidental, though a single bruised eye can be accidental or abusive)
- Repeated or multiple bruising on the head or on sites unlikely to be injured accidentally
- Variation in colour possibly indicating injuries caused at different times
- The outline of an object used e.g. belt marks, hand prints or a hair brush
- Bruising or tears around, or behind, the earlobe/s indicating injury by pulling or twisting
- Bruising around the face
- Grasp marks on small children

- Bruising on the arms, buttocks and thighs may be an indicator of sexual abuse

#### Bite Marks

Bite marks can leave clear impressions of the teeth. Human bite marks are oval or crescent shape. Those over 3 cm in diameter are more likely to have been caused by an adult or an older child.

A medical opinion should be sought where there is any doubt over the origin of the bite.

#### Burns and Scalds

It can be difficult to distinguish between accidental and non-accidental burns and scalds, and will always require experienced medical opinion. Any burn with a clear outline may be suspicious e.g:

- Circular burns from cigarettes (but may be friction burns if along the bony protuberance of the spine)
- Linear burns from hot metal rods or electrical fire elements
- Burns of uniform depth over a large area
- Scalds that have a line indicating immersion or poured liquid (a child getting into hot water of its own accord will struggle to get out and cause splash marks)
- Old scars indicating previous burns / scalds which did not have appropriate treatment or adequate explanation

Scalds to the buttocks of a small child, particularly in the absence of burns to the feet, are indicative of dipping into a hot liquid or bath.

#### Fractures

Fractures may cause pain, swelling and discoloration over a bone or a joint. Non-mobile children rarely sustain fractures.

There are grounds for concern if:

- The history provided is vague, non-existent or inconsistent with the fracture type
- There are associated old fractures
- Medical attention is sought after a period of delay when the fracture has caused symptoms such as swelling, pain or loss of movement
- There is an unexplained fracture in the first year of life

#### Scars

A large number of scars or scars of different sizes or ages, or on different parts of body, may suggest abuse

#### Behavioural Indications

Some children may behave in ways that alert you to the possibility of physical injury, for example

- Withdrawal from physical contact
- Fear of returning home
- Self destructive tendencies
- Aggression towards others

#### Recognising Emotional Abuse

Emotional abuse may be difficult to recognise, as the signs are usually behavioural rather than physical. The manifestations of emotional abuse might also indicate the presence of other kinds of abuse.

The indicators of emotional abuse are often also associated with other forms of abuse. The following may be indicators of emotional abuse:

- Developmental delay
- Abnormal attachment between a child and parent / carer e.g. anxious, indiscriminate or no attachment
- Aggressive behaviour towards others
- Scape-goated within the family
- Frozen watchfulness, particularly in pre-school children
- Low self esteem and lack of confidence
- Withdrawn or seen as a 'loner' – difficulty relating to others
- Over-reaction to mistakes
- Fear of new situations
- Inappropriate responses to painful situations
- Neurotic behaviours
- Self harming
- Running away

#### Recognising Neglect

Evidence of neglect is built up over a period of time and can cover different aspects of parenting.

Indicators include:

- Failure by parents or carers to meet the basic essential needs e.g. adequate food, clothes, warmth, hygiene and medical care
- A child seen to be listless, apathetic and unresponsive with no apparent medical cause
- Failure of child to grow within normal expected pattern, with accompanying weight loss
- Child thrives away from home environment
- Child frequently absent from or late for school
- Child left with adults who are intoxicated or violent
- Child abandoned or left alone for excessive periods
- Compulsive stealing or scavenging

### Recognising Sexual Abuse

Boys and girls of all ages may be sexually abused and are frequently scared to say anything due to guilt and / or fear. This is particularly difficult for a child to talk about and full account should be taken of the cultural sensitivities of any individual child / family.

Recognition can be difficult, unless the child discloses and is believed. There may be no physical signs and indications are likely to be emotional / behavioural.

Some behavioural indicators associated with this form of abuse are:

- Inappropriate sexualised conduct
- Sexually explicit behaviour, play or conversation, inappropriate for the child's age
- Continual and inappropriate or excessive masturbation
- Self-harm (including eating disorder, self mutilation and suicide attempts)
- Involvement in prostitution or indiscriminate choice of sexual partners
- An anxious unwillingness to remove clothes for e.g. sports events (but this may be related to cultural norms or physical difficulties)
- Concerning changes in behaviour or general presentation
- Regressive behaviour
- Distrust of a particular adult
- Unexplained gifts of money
- Sleep disturbances or nightmares
- Phobias or panic attacks

Some physical indicators associated with this form of abuse are:

- Pain or itching of genital area
- Blood on underclothes
- Pregnancy in a younger girl where the identity of the father is disclosed
- Physical symptoms such as injuries to the genital or anal areas, bruising to buttocks, abdomen and thighs, sexually transmitted disease, presence of semen in vagina, anus, external genitalia or clothing
- Wetting or soiling

### Appendix 2: Cause for Concern Form

Procedure: This form is to be completed on ALL occasions when there is any cause for concern in relation to the welfare or safety of a child. It can be filled in by anyone and must be handed to a Designated Safeguarding Person or the Designated Safeguarding Lead.

Student's Full Name:

Class:

Concern initiated by: Signed: (Full name)

Role:

Date:

Time:

Nature of concern:

Details of any witnesses:

Time referred to Designated Safeguarding Person:

To be completed by DSP or DSL:

DSP Print and sign

DSL

Print and sign

Action taken/Referral made:

If the concern is a Health and Safety matter, it should be reported to one of the following:  
Health and Safety Officer / CEO / Site Manager (circle if relevant)

Also recorded in the following places: (tick if relevant)

School Pod / Injury letter

Team Teach book

Home/School Book

Phone call home

Chronology CP

Email home

Body map of injuries

Appendix 3: The Life of a Concern

Incident report

Record the cause for concern on CPOMS Speak to designated team without delay

Discussion

The concerned party/designated person

Consider discussing with parents/carers

Monitor within setting

Seek advice from other agencies.

Health/local authority social care services

Referral

To social services by designated lead

Designated staff confirm monitoring procedure and then review this regularly

Child leaves the setting or is moved to other services, information passed onto the designated person

If further concerns identified

Referral

To social services by designated lead

Initial consideration by social care services

No further action

Reasons given to designated person

Procedures continue (see relevant local safeguarding children board website)

Decision made about continued monitoring

Appendix 4: The Thread throughout our Organisation

Safeguarding is a standing agenda item for all meetings, this document sets out what is expected to be covered under this item at the different meetings. This does not replace raising and recording concerns, but creates an organisation wide environment that is vigilant and responds to need.

Trustee meeting

- Organisational risk related to safeguarding
- Review of data – safeguarding concerns and referrals
- Training needs
- Monitoring and review of policy and procedures
- Any concerns as a result of interaction with the services

BA Senior Management Team meeting

- Risk related to safeguarding, organisational and per service
- Review of data – safeguarding concerns and referrals
- Monitoring and review of policy and procedures
- Any concerns as a result of interaction with the services

School Governing Body/Post 19 Advisory Group meeting

- Risk related to safeguarding at school
- Review of data – safeguarding concerns and referrals
- Training needs
- Monitoring and review of policy and procedures
- Any concerns as a result of interaction with ABA Horizons Senior Leadership Team meeting

Risks related to safeguarding

Review of data – safeguarding concerns and referrals

Any concerns as a result of interaction with the staff, pupils and parents



- Training needs
- Risks related to safeguarding
- Any concerns as a result of interaction with the staff, pupils and parents
- Training needs

- Risks related to safeguarding
- Any concerns as a result of interaction with the staff, pupils and parents
- How the curriculum safeguards our pupils

Whole School meeting

- Safeguarding awareness
- Weekly safeguarding questions
- Any general concerns as a result of interaction with the staff, pupils and parents

- Risks related to safeguarding
- Any client related concerns as a result of interaction with the staff, pupils and parents
- Monitoring safer recruitment practice
- Any concerns as a result of interaction with the school

- Risks related to safeguarding
- Any concerns as a result of interaction with the services
- Monitoring financial procedures

ABA Horizons LTD Marketing & Communications meeting

- Risks related to safeguarding
- Any concerns as a result of interaction with the services
- Monitoring social media
- Monitoring permissions

ABA Horizons LTD Health & Safety meeting

- Risks related to safeguarding
- Any concerns as a result of interaction with the services

ABA Horizons LTD Office Team meeting

- Any concerns as a result of interaction with the services
- Monitoring procedures for visitors, phone calls

All staff 1-to-1 supervision meetings

- Any safeguarding concerns
- Training needs