Child protection and safeguarding policy

(including safer recruitment, safeguarding concerns and allegations about adults, and low-level concerns)

ABA Pathways

Approved by:	Rianna Ritchie	**Date: September 2026**
Last reviewed on:	September 2026	
Next review due by:	September 2027	

This policy is reviewed at least annually and sooner where there are statutory, regulatory, local safeguarding partnership or operational changes.

Contents

- Important contacts
- 1. Aims
- 2. Legislation and statutory guidance
- 3. Definitions
- 4. Equality statement and anti-discriminatory safeguarding
- 5. Roles and responsibilities
- 6. Confidentiality and information sharing
- 7. Recognising abuse and taking action
- 8. Online safety
- 9. Notifying parents or carers
- 10. Children with SEND, health conditions and young carers
- 11. Children with a social worker
- 12. Looked-after and previously looked-after children
- 13. Children who are lesbian, gay, bisexual or gender-questioning
- 14. Record keeping
- 15. Training
- 16. Monitoring arrangements
- 17. Links with other policies
- Appendix 1: Types of abuse
- Appendix 2: Safer recruitment and DBS checks
- Appendix 3: Safeguarding concerns or allegations about adults
- Appendix 4: Specific safeguarding issues

Important contacts

ROLE / ORGANISATION	NAME	CONTACT DETAILS
Designated safeguarding lead (DSL)	Rianna Ritchie	07840053853 rianna.ritchie@abapathways.co.uk
Deputy DSL	Anna Colgate	07852770616 anna.colgate@abapathways.co.uk
Local authority designated officer (LADO)	Essex LADO	Emergencies: 0345 606 1212 emergency.dutyteamoutofhours@essex.gov.uk Advice: 03330 139 797 lado@essex.gov.uk

1. Aims

ABA Pathways aims to ensure that safeguarding and promoting the welfare of children is embedded across all education, early years, respite, community, transport, overnight and therapeutic activity.

- Appropriate action is taken in a timely manner to protect children and promote their welfare.
- All staff, volunteers, subcontractors and contractors understand that safeguarding is everyone's responsibility and that concerns must be acted on immediately.
- Staff are trained to recognise and respond to abuse, neglect, exploitation, harmful behaviour and emerging safeguarding risks, including online harms.
- Children are listened to and their wishes, feelings, communication needs and best interests are considered throughout safeguarding decision-making.
- ABA Pathways works openly and effectively with families and safeguarding partners, unless doing so would place a child at increased risk.

2. Legislation and statutory guidance

This policy is informed by and should be read in conjunction with the Department for Education's statutory guidance Keeping Children Safe in Education 2026 (KCSIE 2026) and Working Together to Safeguard Children 2026. Where KCSIE applies directly to an ABA Pathways education or early years provision, we will meet those requirements. Across our wider respite and community services, we apply the same safeguarding standards as organisational best practice unless a different statutory framework imposes a higher requirement.

This policy also takes account of the Early Years Foundation Stage statutory framework where applicable, local safeguarding partnership procedures, and relevant statutory information-sharing guidance.

- The Children Act 1989 and Children Act 2004.
- The Children and Social Work Act 2017.
- The Female Genital Mutilation Act 2003 and the mandatory reporting duty inserted by the Serious Crime Act 2015.
- The Rehabilitation of Offenders Act 1974 and relevant Exceptions Orders.
- The Safeguarding Vulnerable Groups Act 2006 and subsequent amendments, including the 2026 change to regulated activity.
- The Crime and Policing Act 2026, including removal of the previous supervision exemption in regulated activity.
- The Counter-Terrorism and Security Act 2015 and current Prevent duty guidance.
- The Human Rights Act 1998.
- The Equality Act 2010 and Public Sector Equality Duty.
- The Data Protection Act 2018, UK GDPR and the Data (Use and Access) Act 2025.
- The Childcare Act 2006 and Childcare Disqualification Regulations 2018, where applicable.

3. Definitions

Safeguarding and promoting the welfare of children means providing help and support as soon as problems emerge; protecting children from maltreatment inside or outside the home, including online;

preventing impairment of mental and physical health or development; ensuring children grow up with safe and effective care; and taking action to enable the best outcomes.

Child protection is part of safeguarding and refers to activity undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm.

Abuse, neglect and exploitation may occur separately or together. Harm may be caused by adults or children, by people known to the child or unknown to them, and may occur in person or through technology.

Making or sharing nudes or semi-nudes includes the creation, sending, receiving, requesting or distribution of nude or semi-nude images, videos or live streams involving children, whether consensual or non-consensual. It includes AI-generated or manipulated imagery that appears to depict a real child or another identifiable person.

Children means everyone under the age of 18. We will use language such as “victim”, “child who has harmed”, “alleged perpetrator” or other terms sensitively and according to the context and the child’s preferences, while recognising that safeguarding may be required for all children involved.

The three statutory safeguarding partners are the local authority, the relevant integrated care board and the chief constable for the police area.

4. Equality statement and anti-discriminatory safeguarding

Some children face additional barriers to recognition, disclosure or access to help. ABA Pathways is committed to inclusive, anti-discriminatory safeguarding and will challenge racism, sexism, misogyny, misandry, homophobia, biphobia, faith-based prejudice, disability discrimination and other derogatory or discriminatory conduct.

Discrimination or prejudice can itself cause harm and can also increase vulnerability to bullying, exploitation, poor mental health and reluctance to seek help. Staff must consider whether a safeguarding concern is being minimised, misunderstood or attributed to a protected characteristic, disability or family circumstance.

- Children with SEND, communication differences, learning disabilities or health conditions.
- Young carers and children affected by parental illness, offending or imprisonment.
- Children in temporary accommodation, experiencing homelessness or insecure housing.
- Looked-after and previously looked-after children, care leavers and children in kinship or other care arrangements.
- Children who are lesbian, gay, bisexual or gender-questioning, or who are perceived by others to be.
- Children who experience racism, faith-based prejudice or other discrimination.
- Children who are absent from education, on part-time timetables, repeatedly suspended or excluded, or placed in alternative provision.
- Children at risk of FGM, forced marriage, honour-based abuse, domestic abuse, sexual or criminal exploitation, trafficking, modern slavery, radicalisation or serious violence.

5. Roles and responsibilities

5.1 All staff, volunteers and subcontractors

Safeguarding is everyone's responsibility. All staff must read Part One of KCSIE 2026 in full at least annually and follow ABA Pathways' safeguarding procedures. The KCSIE Part One overview may be used as a quick reference but does not replace Part One.

- Know the identity and contact arrangements of the DSL and deputy DSL and understand how to report concerns when they are unavailable.
- Understand the local pathways for universal services and community-based early help, the targeted early help level of Family Help, and statutory children's social care intervention.
- Recognise that a child or family may experience multiple needs or harms at the same time.
- Maintain professional curiosity, particularly where a child cannot communicate a concern conventionally or where behaviour changes may communicate distress.
- Act immediately on safeguarding concerns; staff should never assume someone else will take action.
- Understand whistleblowing, allegations/low-level concerns, online safety, filtering and monitoring, mobile-device expectations, and safe use of AI.
- Reassure children that concerns will be taken seriously and that they will be supported and kept safe.

5.2 Designated safeguarding lead (DSL)

Rianna Ritchie is the DSL and takes lead responsibility for child protection and wider safeguarding, including online safety and oversight of filtering and monitoring. Anna Colgate is the deputy DSL. If both are unavailable, Nicola Agambar, co-director, will act as safeguarding cover.

ABA Pathways will maintain robust DSL cover arrangements during working hours and for relevant out-of-hours or overnight activity. Staff must know how to raise a concern without delay. A confidential shared safeguarding mailbox or equivalent monitored system may be used to support continuity, but it does not replace the requirement to escalate urgent concerns immediately.

- Manage and support referrals to children's social care, police, Channel, DBS and LADO as required.
- Liaise with staff, families, commissioners and relevant professionals so that safeguarding, welfare, health, SEND and educational needs are considered holistically.
- Understand local Family Help and statutory assessment thresholds and referral arrangements.
- Maintain a good understanding of harmful sexual behaviour, child-on-child abuse, exploitation, serious violence, Prevent and online safety.
- Ensure child protection records are accurate, secure, reviewed, transferred and acted on promptly.
- Promote a culture of listening to children and support staff to adapt communication so children with SEND can express wishes, feelings and concerns.

5.3 Directors

The directors are responsible for ensuring this policy is implemented, reviewed at least annually, adequately resourced and understood by all staff and contractors. They provide strategic challenge and assurance that safeguarding arrangements are effective.

- Ensure safer recruitment, induction, supervision, training and appropriate staffing arrangements.
- Ensure appropriate oversight of allegations and low-level concerns, including conflicts of interest and referrals to the LADO where required.
- Oversee safe use of technology, mobile phones, cameras, data systems and filtering/monitoring.
- Ensure appropriate safeguarding arrangements for AP, respite, transport, community activity, overnight provision and use of premises by third parties.

6. Confidentiality and information sharing

Timely information sharing is essential to effective safeguarding. Data protection law is not a barrier to sharing information where it is necessary, proportionate and lawful to protect a child. Staff must not promise a child absolute confidentiality.

When deciding whether and how to share information, staff should consider the purpose, necessity, proportionality, accuracy, security and potential impact on the child. The DSL should be consulted where practicable, but this must not delay urgent action.

- Information will be shared on a need-to-know basis and recorded, including the rationale for significant decisions to share or not share.
- Parents or carers will normally be informed of safeguarding concerns unless this would increase risk, prejudice an investigation or conflict with advice from statutory agencies.
- Special-category data may be shared without consent where an appropriate safeguarding legal basis applies.
- Where staff are unsure, they should seek advice from the DSL; where a child is at immediate risk, they should contact children's social care and/or police without delay.

7. Recognising abuse and taking action

All staff are expected to identify and recognise abuse, neglect, exploitation and harmful behaviour. Staff must maintain an attitude of "it could happen here" and be alert to overlapping harms, including online harm, domestic abuse, CCE/CSE, modern slavery, financial exploitation, serious violence, stalking, child-to-parent or caregiver abuse, harmful sexual behaviour, prejudice-based harm and radicalisation.

Additional indicators for early support include changes in attendance, repeated removal from lessons or activities, part-time timetables, repeated suspensions/exclusions, pregnancy or parenthood, problematic online content or relationships, and early abusive, violent or harmful behaviour.

7.1 If a child is suffering or likely to suffer harm, or is in immediate danger

Make an immediate referral to local authority children's social care and/or police. Anyone can make a referral. Inform the DSL as soon as possible, but do not delay action while waiting for the DSL.

7.2 If a child makes a disclosure

- Listen, believe and allow the child time to communicate without asking leading questions.
- Stay calm; do not express shock, blame or disbelief.
- Explain that you must share information with people who can help and do not promise secrecy.
- Use the child's own words where possible. Record what was said, how the communication occurred and any relevant context as soon as possible.

- Do not investigate. Pass the record to the DSL or make a direct referral where immediate action is required.

For children with communication differences, disclosure may occur through AAC, gesture, behaviour, symbols, writing, drawing, changes in routine or other forms of communication. Staff should use familiar communication supports without coaching or interpreting beyond what is reasonably evidenced.

7.3 Female genital mutilation (FGM)

FGM is illegal and is a form of child abuse. A regulated professional who is told by a girl under 18 that FGM has been carried out on her, or who observes physical signs that appear to show it has been carried out, must personally report this to the police in accordance with the mandatory reporting duty. Suspected risk of FGM must be referred through normal safeguarding procedures. Staff must not examine a child.

7.4 Concerns about a child: universal help, community-based early help and Family Help

Where a child is not in immediate danger, staff should speak to the DSL and agree the appropriate response. The local continuum of support may include universal services and community-based early help, targeted early help through Family Help, section 17 support for children in need, and section 47 child protection enquiries.

The DSL will consider the local assessment protocol and threshold guidance and will keep cases under review. If support is not improving the child's circumstances, concerns escalate, or new information indicates risk of significant harm, a referral to children's social care will be made. Non-social-worker practitioners may contribute to or lead relevant early or Family Help activity where this is appropriate within local arrangements.

7.5 Concerns about extremism or radicalisation

Concerns about radicalisation must be discussed with the DSL and managed in line with the Prevent duty and local Channel arrangements. Where there is immediate danger or suspected terrorism, contact police immediately.

7.6 Mental health and safeguarding

Mental health difficulties can be a consequence or indicator of abuse, neglect, exploitation, discrimination or other harm, but a mental health need is not automatically a safeguarding concern. Staff should be alert to significant changes in mood, behaviour, sleep, eating, self-harm, withdrawal, distress, trauma responses or deterioration in functioning.

Where a mental health concern is also a safeguarding concern, safeguarding procedures must be followed immediately. Support should be coordinated with relevant health or mental health professionals while maintaining appropriate safeguarding oversight.

7.7 Concerns about staff, volunteers, subcontractors, trainee teachers or contractors

Any concern or allegation that an adult working in or on behalf of ABA Pathways may have harmed a child, may pose a risk, may have committed a relevant criminal offence, or behaved in a way indicating they may not be suitable to work with children must be reported without delay. The procedures in Appendix 3 apply, including consideration of referral to the LADO. Where there is a conflict of interest, the concern should be escalated directly to the LADO or another appropriate senior person.

7.8 Child-on-child abuse (including harassment and violence)

Children can abuse other children. This includes bullying, physical violence, threats involving weapons, sexual harassment, sexual violence, harmful sexual behaviour, coercive or controlling behaviour, abuse in intimate relationships, prejudice-based abuse, online abuse, initiation/hazing, upskirting, sharing sexual imagery and exploitation. It is a safeguarding issue for both the child harmed and the child alleged to have harmed, and it is preventable.

Abuse will never be dismissed as banter, part of growing up or an inevitable feature of SEND. The DSL will consider immediate safety, risk assessment, support for all children involved, separation where necessary, police/social-care referral, transport/community risks, online contact and the needs of witnesses or siblings.

7.9 Making or sharing nudes and semi-nudes

Every incident involving making or sharing nudes or semi-nudes requires a safeguarding response, whether the image was created or shared consensually or non-consensually. This includes AI-generated, digitally altered or “deepfake/deepnude” sexual imagery.

- Do not view, copy, print, forward, save or ask a child to download the imagery unless specifically directed by police or another competent authority and necessary for safeguarding.
- Do not ask a child to delete evidence before the DSL has assessed the situation.
- Report the concern to the DSL immediately and reassure the child that they will be supported.
- The DSL will assess coercion, grooming, age, developmental capacity, distribution, violence, blackmail, immediate risk and whether police/children’s social care referral is required.

7.10 Reporting systems for children

ABA Pathways will provide accessible ways for children to raise concerns. Reporting methods will be adapted to communication need and may include direct speech, AAC, visual systems, written communication, trusted-adult check-ins, behaviour/communication observation and parent/professional liaison. Children will be told that concerns are taken seriously and that they can safely express their views.

7.11 ABA Pathways service-specific safeguarding

Because ABA Pathways works across education, respite, community, transport and potentially overnight settings, safeguarding arrangements must travel with the child and not be confined to a classroom or site.

- 1:1 working: staff should avoid unnecessary isolation, use agreed environments, maintain professional boundaries, and ensure session locations and handovers are known to the team.
- Community and transport: staff must use agreed risk assessments, maintain appropriate supervision, know emergency and missing-child procedures, and report unexplained changes in presentation or interactions.
- Overnight respite: staff must follow sleep, medication, personal care, intimate care, staffing, visitor and emergency procedures; overnight activity is regulated activity and requires the appropriate checks.
- Personal and intimate care: care must be respectful, necessary, recorded where required and delivered in line with agreed plans. Concerns about injuries, distress, repeated lack of essential

medication/equipment or resistance around a particular adult must be explored with professional curiosity.

- Restrictive intervention: any restrictive physical intervention must be lawful, necessary, proportionate and the least restrictive option reasonably available. It must never be used as punishment. Incidents must be recorded, reviewed and considered alongside the child's BSP, communication, environment, trauma history, medical needs and safeguarding risk.
- Safeguarding handovers: relevant information must be shared between education and respite/community teams on a need-to-know basis so that risks, restrictions, medical needs and current safeguarding plans are consistently understood.

7.12 Alternative provision, commissioned placements and attendance

Where ABA Pathways provides alternative provision commissioned by a school or local authority, safeguarding responsibility is shared. The commissioning school remains responsible for safeguarding the pupil and should assure itself that the placement is suitable. ABA Pathways will provide written confirmation of relevant safer-recruitment checks and will notify commissioners of material staffing or safeguarding changes that could affect risk.

- ABA Pathways and the commissioner should know where the child is based during education hours, including any satellite or subcontracted locations.
- Attendance and unexplained absence will be monitored and communicated promptly under agreed arrangements.
- Placements should be reviewed regularly and at least at the frequency required by statutory guidance; safeguarding concerns trigger immediate review.
- A placement will not be continued merely for continuity if safeguarding concerns cannot be satisfactorily managed.

8. Online safety

Technology is a significant component of safeguarding and wellbeing. ABA Pathways uses a whole-setting approach to online safety across content, contact, conduct and commerce risks, including sexual abuse, bullying, scams, exploitation, radicalisation, harmful content and technology-facilitated coercion.

- Children will be taught and supported to use technology safely at a level appropriate to their age, development and communication needs.
- Parents and carers will be informed about relevant online-safety expectations, including filtering/monitoring and the digital tools children are asked to use.
- Staff receive online-safety training at induction and regular updates, including filtering and monitoring, AI, cyberbullying, grooming and radicalisation.
- Online incidents are recorded and escalated through safeguarding procedures where they indicate risk of harm.

8.1 Artificial intelligence (AI)

Generative AI can support learning and administration but may also facilitate bullying, grooming, impersonation, misinformation, harmful content, data leakage, sexual abuse imagery and deepfakes. Staff must use only approved systems for identifiable or sensitive information and must follow data-protection, confidentiality and safeguarding requirements.

Before introducing a new AI tool for use with children, ABA Pathways will consider safeguarding, privacy, age suitability, content controls, data retention, moderation, accessibility, bias and whether the tool could expose a child to harmful interaction. AI-generated sexual imagery involving a child is treated as a safeguarding matter in the same way as other nude/semi-nude imagery.

8.2 Mobile phones, cameras and personal devices

ABA Pathways will maintain clear rules for mobile phones and personal devices. In education settings, the default expectation is that children do not have unrestricted access to personal mobile phones during the school day, subject to reasonable adjustments, health, communication or safeguarding needs. Service-specific arrangements may differ for respite/community settings but must remain risk assessed.

- Staff must not use personal devices to photograph or record children unless specifically authorised under an exceptional, documented arrangement.
- Images or recordings for legitimate service purposes must be captured, stored, transferred and deleted using approved systems.
- Staff must not establish private social-media relationships or communicate with children outside approved channels.
- Smartwatches and other connected devices are included where they can record, message, stream or access online content.

8.3 Filtering and monitoring

Filtering and monitoring arrangements will be proportionate to the service and technology used. Their effectiveness will be reviewed at least once every academic year by the senior leader responsible for filtering and monitoring, supported by the DSL and appropriate IT support. The review will include checks that filtering operates appropriately on internet-connected devices in relevant locations and a record of the checks will be kept.

Filtering must not create unreasonable barriers to safeguarding, SEND access or legitimate learning. Monitoring alerts and logs will be handled securely and escalated to the DSL where they indicate safeguarding risk.

9. Notifying parents or carers

Where appropriate, safeguarding concerns will be discussed with parents or carers. The DSL will normally lead this communication. Parents will not be informed where doing so may place the child or another person at greater risk, interfere with an investigation or conflict with advice from children's social care or police.

For child-on-child incidents, information about another child will be shared only where lawful and necessary. Support and safety planning for the child harmed and the child alleged to have harmed will be discussed separately with their respective families as appropriate.

10. Children with SEND, health conditions and young carers

10.1 Children with SEND

ABA Pathways primarily supports children with SEND and recognises that disabled children and children with communication, learning or sensory differences can face additional safeguarding risk both online and offline.

- Indicators of abuse, neglect or exploitation may be wrongly attributed to disability, autism, behaviour, communication difficulty or a medical condition.
- A child may not understand that what is happening to them is abusive or may not have conventional language to describe it.
- Dependence on adults for care, intimate care, medication, mobility, communication or access to the community can increase vulnerability.
- Isolation, reduced peer access and reliance on a small number of adults can reduce opportunities to disclose.
- Bullying or exploitation may have a disproportionate impact without obvious outward signs.
- Online grooming, manipulation and misinformation may be harder to recognise where a child has difficulty distinguishing fact, fiction, intent or social risk.

Staff must use professional curiosity and consider safeguarding when there are sudden or unexplained changes in aggression, self-injury, withdrawal, sleep, eating, toileting, communication, tolerance of personal care, anxiety around a person/place, sexualised behaviour or unexplained injury. These changes must not automatically be treated as a behaviour-management issue.

Where a concern involves a child with SEND, the DSL should work closely with the person overseeing SEND and ensure appropriate communication support is available throughout any safeguarding process.

10.2 Safeguarding children with medical conditions

A medical incident does not automatically require a safeguarding referral. However, safeguarding action is required where the circumstances suggest increased risk of neglect, abuse or exploitation. Examples include repeated failure to provide essential medication, equipment or information; deliberate interference with treatment; unexplained injury; unsafe care arrangements; or a pattern that places the child at risk.

10.3 Young carers

Staff will be alert to children who provide significant care to a parent, sibling or other family member. Caring responsibilities can affect attendance, attainment, sleep, behaviour, mental health and wellbeing. Early identification enables appropriate support from the setting, Family Help, local authority, health and other services.

11. Children with a social worker

Children may need a social worker because of abuse, neglect, exploitation or complex family circumstances. Adversity and trauma can increase vulnerability to further harm and create barriers to attendance, engagement, learning, behaviour and mental health.

Where ABA Pathways knows a child has or has had a social worker, the DSL will use that information routinely when considering safety, welfare and educational outcomes. Relevant information will be shared with staff on a need-to-know basis and support will continue to recognise the possible lasting impact even after statutory intervention ends.

12. Looked-after and previously looked-after children

ABA Pathways will ensure appropriate staff understand the legal status, care arrangements, contact arrangements and safeguarding needs of looked-after and previously looked-after children. The DSL

will maintain relevant social-worker and carer contact details and work with the Virtual School Head and other professionals where relevant to promote safety, attendance and educational outcomes.

13. Children who are lesbian, gay, bisexual or gender-questioning

Being lesbian, gay or bisexual is not itself a safeguarding risk. Children may, however, be vulnerable to discriminatory bullying, harassment, family rejection or online abuse because of their actual or perceived sexual orientation. ABA Pathways will actively prevent and respond to such harm.

For gender-questioning children, safeguarding decisions will be individual, child-centred and consistent with current law, statutory guidance, the Equality Act 2010 and the Human Rights Act 1998. Staff should avoid making assumptions about a child's identity or needs. The child's wishes and feelings, safety, age, development, SEND, family context, privacy, dignity and risk of bullying should be considered.

Where a child requests changes relating to social transition or sex-separated facilities, senior leaders will consider the request carefully against current statutory guidance and legal duties, including safeguarding, privacy and the rights and welfare of other children. Parents or carers will normally be involved unless there is a specific safeguarding reason not to do so.

14. Record keeping

All safeguarding concerns, discussions, decisions and the rationale for decisions must be recorded in writing. Records should be clear, factual and distinguish observed information, professional opinion and historic information.

- A clear and comprehensive summary of the concern.
- How the concern was followed up and resolved.
- Actions taken, decisions reached, referrals made or not made, and the rationale.
- The child's communication, wishes and feelings where relevant.
- Any risk assessment, support plan or safety arrangements.

Safeguarding records will be stored securely and separately from ordinary educational records, with access limited to those who need the information. When a child moves to another education setting, the DSL will transfer the child-protection file as soon as possible and within 5 days for an in-year transfer or within the first 5 days of a new term, where KCSIE applies. The transfer will be secure and separate from the main pupil file, and receipt will be confirmed.

A structured transfer summary should identify current safeguarding concerns, relevant context and ongoing support needs, and clearly distinguish current risk from historic information. Where concerns are significant or complex, DSL-to-DSL discussion should take place so information is actively understood and acted upon.

For transitions between ABA Pathways services, safeguarding handover will be proportionate, secure and timely so that relevant risks and support arrangements are not lost.

15. Training

15.1 All staff

All staff will receive safeguarding and child-protection training at induction, including whistleblowing, allegations and low-level concerns, online safety, filtering and monitoring, mobile-device expectations

and Prevent. Training will be updated regularly and staff will receive safeguarding updates at least annually.

All staff must read KCSIE 2026 Part One in full and confirm that they have done so at least annually. Training will reflect local safeguarding-partnership advice and ABA Pathways' SEND, AP, respite, transport and overnight contexts.

15.2 DSL and deputy DSL

The DSL and deputy DSL will undertake formal safeguarding training at least every 2 years and refresh knowledge and skills at regular intervals and at least annually. Training will include Family Help and statutory intervention, local thresholds, information sharing, child-on-child abuse and HSB, SEND, medical vulnerability, young carers, online safety, filtering/monitoring and Prevent.

15.3 Directors

Directors receive safeguarding and online-safety training at induction and regular updates so that they can provide effective strategic oversight, challenge and assurance.

15.4 Safer recruitment

At least one person involved in interviewing for roles working with children will have completed safer-recruitment training. Recruitment procedures are set out in Appendix 2 and reflect KCSIE 2026, including the 2026 changes to regulated activity and volunteer checks.

15.5 Supervision

Staff who work with children and families will receive supervision that supports safeguarding reflection, professional curiosity, boundaries, staff wellbeing, practice improvement and discussion of sensitive issues.

16. Monitoring arrangements

This policy will be reviewed at least annually by the DSL and approved by the directors. The next scheduled review is September 2027. It will be reviewed earlier if there is a change in statutory guidance, legislation, local safeguarding arrangements, services offered by ABA Pathways, serious safeguarding learning or evidence that procedures are not working effectively.

Safeguarding practice will also be monitored through supervision, incident review, low-level-concern pattern analysis, training records, safer-recruitment audits, record-keeping audits, AP/attendance review and the annual filtering and monitoring effectiveness review.

17. Links with other policies

- Behaviour and behaviour support
- Staff code of conduct
- Complaints
- Health and safety
- Attendance
- Equality and inclusion
- First aid and medical needs
- Online safety / acceptable use

- Data protection and confidentiality
- Restrictive intervention / physical intervention
- Whistleblowing
- Safer recruitment
- Transport and community safety
- Medication and intimate/personal care
- Missing child / child absent from provision procedures

Appendix 1: types of abuse

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by 1 definition or label. In most cases, multiple issues will overlap. Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing 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 is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone. Emotional abuse may involve verbal abuse (for example criticism, belittling or name-calling) and 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
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- 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
- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children Sexual abuse involves forcing or enticing a child or young person 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
- Non-contact 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. Neglect 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. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:
- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate care-givers)
- Ensure access to appropriate medical care or treatment It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Appendix 2: safer recruitment and DBS checks – policy and procedures

Safer recruitment policy

Recruitment and selection process

To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training. We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children.

Advertising

When advertising roles, we will make clear:

- Our commitment to safeguarding and promoting the welfare of children
- That safeguarding checks will be undertaken
- The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children
- Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account

Application forms

Our application forms will:

- Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)
- Include a copy of, or link to, our child protection and safeguarding policy and our policy on the employment of ex-offenders

Shortlisting

Our shortlisting process will involve at least 2 people and will:

- Consider any inconsistencies and look for gaps in employment and reasons given for them
- Explore all potential concerns Once we have shortlisted candidates, we will ask shortlisted candidates to:
- Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:
    - o If they have a criminal history
    - o Whether they are included on the barred list
    - o Whether they are prohibited from teaching
    - o Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
    - o Any relevant overseas information
- Sign a declaration confirming the information they have provided is true We will also consider carrying out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online. Shortlisted candidates will be informed that we may carry out these checks as part of our due diligence process.

Seeking references and checking employment history

We will obtain references before interview. Any concerns raised will be explored further with referees and taken up with the candidate at interview. When seeking references we will:

- Not accept open references
- Liaise directly with referees and verify any information contained within references with the referees
- Ensure any references are from the candidate's current employer and completed by a senior person
- Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed
- Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children

- Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate
- Resolve any concerns before any appointment is confirmed

Interview and selection

When interviewing candidates, we will:

- Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this
- Explore any potential areas of concern to determine the candidate's suitability to work with children
- Record all information considered and decisions made

Pre-appointment vetting checks

We will record all information on the checks carried out in the setting's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

New staff

All offers of appointment will be conditional until satisfactory completion of the necessary pre-employment checks. When appointing new staff, we will:

- Verify their identity
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK
- We will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Regulated activity

The definition of regulated activity must be applied in line with current legislation and Keeping Children Safe in Education 2026. The Crime and Policing Act 2026 removed the previous supervision exemption for relevant volunteer activity. In particular, a person volunteering in a school or college role involving teaching, training, instructing or supervising children on more than 3 days in a 30-day period, or overnight, is now in regulated activity. Regulated activity also includes relevant paid work and certain personal or intimate care and overnight activities. ABA Pathways will assess each role against current DBS and DfE guidance and obtain the appropriate enhanced DBS and children's barred list check where the role is regulated activity. Where our provision is subject to the EYFS framework, a member of staff or volunteer who requires an enhanced DBS

certificate with children's barred list information will not begin work in the EYFS setting until the certificate has been received and checked.

Existing staff

In certain circumstances we will carry out all the relevant checks on existing staff as if the individual was a new member of staff. These circumstances are when:

- There are concerns about an existing member of staff's suitability to work with children; or
- An individual moves from a post that is not regulated activity to one that is; or
- There has been a break in service of 12 weeks or more We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:
- We believe the individual has engaged in relevant conduct; or
- We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009; or
- We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

Agency and third-party staff

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

Volunteers

We will:

- Assess the proposed volunteer role against the current statutory definition of regulated activity before the volunteer starts.
- Obtain an enhanced DBS check with children's barred list information where the volunteer will engage in regulated activity.
- Recognise that the previous supervision exemption has been removed: supervision alone does not take a volunteer out of regulated activity where the statutory frequency/activity tests are met.
- Never permit a volunteer to undertake regulated activity until the required checks have been completed.
- Where a volunteer role is not regulated activity, decide whether an enhanced DBS check without barred list information is appropriate and legally available, supported by a written risk assessment.
- Apply the Childcare Act 2006 and Childcare Disqualification Regulations where relevant, retaining any assessment and risk-control decision on file.
- Apply the EYFS requirement that relevant staff and volunteers must not begin work in the EYFS setting until the required enhanced DBS certificate, including barred list information, has been received.

Appendix 3: safeguarding concerns or allegations about staff, volunteers, trainee teachers, subcontractors and contractors

Allegations and low-level concerns procedures

Section 1: concerns or allegations that may meet the harm threshold

This section applies to all cases in which it is alleged that a current member of staff, volunteer, trainee teacher, subcontractor or contractor has:

- Behaved in a way that has harmed a child, or may have harmed a child, and/or
- Possibly committed a criminal offence against or related to a child, and/or
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children, and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of the setting If we're in any doubt as to whether a concern meets the harm threshold, we will consult out local authority designated officer (LADO). We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation. A 'case manager' will lead any investigation. This will be the DSL, or another of ABA Pathways' directors where the DSL is the subject of the allegation. The case manager will be identified at the earliest opportunity. Our procedures for dealing with allegations will be applied with common sense and judgement. If we receive an allegation of an incident happening while an individual or organisation was using ABA Pathways' premises to run activities for children, we will follow our safeguarding policies and procedures and inform our LADO.

Suspension of the accused until the case is resolved

Suspension of the accused will not be the default position, and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that there might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative. Based on an assessment of risk, we will consider alternatives such as:

- Redeployment within the setting so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in the setting so that they do not have unsupervised access to children If in doubt, the case manager will seek views from the designated officer at the local authority, as well as the police and local authority children's social care where they have been involved.

Definitions for outcomes of allegation investigations

- Substantiated: there is sufficient evidence to prove the allegation
- Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation
- False: there is sufficient evidence to disprove the allegation
- Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made

Procedure for dealing with allegations In the event of an allegation that meets the criteria above, the case manager will take the following steps:

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or local authority children's social care services. (The case manager may, on occasion, consider it necessary to involve the police before consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or local authority children's social care services, where necessary). Where the police and/or local authority children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or local authority children's social care services, as appropriate
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to local authority children's social care
- If immediate suspension is considered necessary, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- If it is decided that no further action is to be taken in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- If it is decided that further action is needed, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or local authority children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with local authority children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a staff member will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

Timescales

We will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week
- If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days
- If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

Specific actions Action following a criminal investigation or prosecution The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or local authority children's social care services. Conclusion of a case where the allegation is substantiated If the allegation is substantiated and the individual is dismissed or the setting ceases to use their services, or the individual resigns or otherwise ceases to provide their services, ABA Pathways will make a referral to the DBS for consideration of whether inclusion on the barred lists is required. Individuals returning to work after suspension If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this. The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the setting.

Unsubstantiated, unfounded, false or malicious reports

If a report is:

- Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to local authority children's social care may be appropriate
- Shown to be deliberately invented, or malicious, the setting will consider whether any disciplinary action is appropriate against the individual(s) who made it Unsubstantiated, unfounded, false or malicious allegations If an allegation is:
- Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to local authority children's social care may be appropriate
- Shown to be deliberately invented, or malicious, the setting will consider whether any disciplinary action is appropriate against the individual(s) who made it

Confidentiality and information sharing

The setting will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The case manager will take advice from the LADO, police and local authority children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises

Record-keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case. The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file). For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken, decisions reached and the outcome
- A declaration on whether the information will be referred to in any future reference In these cases, the setting will provide a copy to the individual, in agreement with local authority children's social care or the police as appropriate. We will retain all records at least until the accused individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

References

When providing employer references, we will:

- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious
- Include substantiated allegations, provided that the information is factual and does not include opinions

Learning lessons

After any cases where the allegations are substantiated, the case manager will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to the setting's procedures or practice to help prevent similar events in the future. This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension
- Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

Non-recent allegations

Abuse can be reported, no matter how long ago it happened. We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations. Where an adult makes an allegation to the setting that they were abused as a child, we will advise the individual to report the allegation to the police.

Section 2: concerns that do not meet the harm threshold

This section applies to all concerns (including allegations) about members of staff, which do not meet the harm threshold set out in section 1 above. Concerns may arise through, for example:

- Suspicion
- Complaint
- Safeguarding concern or allegation from another member of staff
- Disclosure made by a child, parent or other adult within or outside the setting

- Pre-employment vetting checks We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

Definition of low-level concerns

The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the setting may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority Examples of such behaviour could include, but are not limited to:
- Being overly friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Humiliating pupils

Sharing low-level concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to confidentially share low-level concerns so that they can be addressed appropriately. We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns as per section 7.7 of this policy
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the setting's safeguarding system

Responding to low-level concerns

If the concern is raised via a third party, the DSL will collect evidence where necessary by speaking:

- Directly to the person who raised the concern, unless it has been raised anonymously
- To the individual involved and any witnesses The DSL will use the information collected to categorise the type of behaviour and determine any further action, in line with the setting's staff code of conduct. The DSL will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the other directors.

Record keeping

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken. Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harm threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority

- Retained at least until the individual leaves employment at the school Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

References

We will not include low-level concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance

Appendix 4: specific safeguarding issues

KCSIE 2026 additions and strengthened areas

Staff must remain alert to safeguarding issues that overlap or occur simultaneously. In addition to the issues set out below, particular attention must be paid to modern slavery, financial exploitation, stalking and abuse within intimate relationships, child-to-parent or caregiver abuse, serious violence, prejudice-based harm (including racism, misogyny and misandry), and technology-facilitated abuse.

Modern slavery and exploitation

Modern slavery can include human trafficking, slavery, servitude and forced or compulsory labour. Child criminal exploitation and child sexual exploitation can constitute modern slavery. A child may not recognise themselves as a victim and may appear to comply because of coercion, threats, debt, dependency, grooming or fear. Concerns must be referred to the DSL and, where appropriate, children's social care, police and the National Referral Mechanism in accordance with current statutory guidance.

Financial exploitation

Staff should be alert to children being manipulated, coerced or deceived into moving, receiving or holding money or goods; allowing accounts to be used by others; becoming involved in fraud; taking on debt; or being financially controlled by peers, adults, criminal networks or intimate partners. Financial exploitation may overlap with CCE, county lines, sexual exploitation, modern slavery and online abuse.

Child-to-parent or caregiver abuse

Children can display abusive, violent, coercive or controlling behaviour towards parents or caregivers. This may coexist with the child's own experiences of trauma, exploitation, SEND or other unmet need. Such behaviour should not be dismissed as simply a behaviour-management issue. The safety and needs of all family members must be considered and appropriate safeguarding or Family Help referrals made.

Temporary accommodation and homelessness

Living in temporary accommodation or being homeless can increase safeguarding vulnerability. The DSL will be alert to local notification and referral arrangements and will consider the effect of housing instability on attendance, wellbeing, access to medication/equipment, family stress and exploitation risk.

Violence against women and girls and prejudice-based harm

ABA Pathways will challenge sexism, misogyny, misandry, racism, faith-based prejudice, homophobia, biphobia and other discriminatory or derogatory conduct. Such behaviour can be a safeguarding issue, can normalise harassment or violence, and may inhibit a child from seeking help. Patterns will be recorded, reviewed and addressed through safeguarding, behaviour support and education as appropriate.

Assessing adult-involved nude and semi-nude sharing incidents All adult-involved nude and semi-nude image sharing incidents are child sexual abuse offences and must immediately be referred to police/social care.

However, as adult-involved incidents can present as child-on- child nude/semi-nude sharing, it may be difficult to initially assess adult involvement. There are two types of common adult-involved incidents: sexually motivated incidents and financially motivated incidents. Sexually motivated incidents In this type of incident, an adult offender obtains nude and semi-nudes directly from a child or young person using online platforms. To make initial contact, the offender may present as themselves or use a false identity on the platform, sometimes posing as a child or young person to encourage a response and build trust. The offender often grooms the child or young person on social media, in chatrooms or on gaming platforms, and may then move the conversation to a private messaging app or an end-to-end encrypted (E2EE) environment where a request for a nude or semi-nude is made. To encourage the child or young person to create and share nude or semi- nude, the offender may share pornography or child sexual abuse material (images of other young people), including AI-generated material. Once a child or young person shares a nude or semi-nude, an offender may blackmail the child or young person into sending more images by threatening to release them online and/or send them to friends and family. Potential signs of adult-involved grooming and coercion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person
- Quickly engaged in sexually explicit communications, which may include the offender sharing unsolicited images
- Moved from a public to a private/E2EE platform
- Coerced/pressured into doing sexual things, including creating nudes and semi-nudes
- Offered something of value such as money or gaming credits
- Threatened or blackmailed into carrying out further sexual activity. This may follow the child or young person initially sharing the image or the offender sharing a digitally manipulated image of the child or young person to extort 'real' images Financially motivated incidents

Financially motivated sexual extortion (often known as 'sextortion') is an adult-involved incident in which an adult offender (or offenders) threatens to release nudes or semi-nudes of a child or young person unless they pay money or do something else to benefit them.

Unlike other adult-involved incidents, financially motivated sexual extortion is usually carried out by offenders working in sophisticated organised crime groups (OCGs) overseas and are only motivated by profit. Adults are usually targeted by these groups too.

Offenders will often use a false identity, sometimes posing as a child or young person, or hack another young person's account to make initial contact. To financially blackmail the child or young person, they may:

- Groom or coerce the child or young person into sending nudes or semi-nudes and financially blackmail them
- Use images that have been stolen from the child or young person taken through hacking their account
- Use digitally manipulated images, including AI-generated images, of the child or young person

The offender may demand payment or the use of the victim's bank account for the purposes of money laundering. Potential signs of adult-involved financially motivated sexual extortion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person. They may be contacted by a hacked account of a child or young person
- Quickly engaged in sexually explicit communications which may include the offender sharing an image first
- Moved from a public to a private/E2EE platform
- Pressured into taking nudes or semi-nudes
- Told they have been hacked and they have access to their images, personal information and contacts
- Blackmailed into sending money or sharing bank account details after sharing an image or the offender sharing hacked or digitally manipulated images of the child or young person

Child criminal exploitation Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity. It may involve an exchange for something the victim needs or wants, and/or for the financial or other advantage

of the perpetrator or facilitator, and/or through violence or the threat of violence. The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people. Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Suffering from changes in emotional wellbeing
- Misusing drugs and alcohol
- Going missing for periods of time or regularly coming home late
- Regularly missing school or education
- Not taking part in education If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Child sexual exploitation Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity. It may involve an exchange for something the victim needs or wants and/or 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 perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship. CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images. In addition to the CCE indicators above, indicators of CSE can include a child:

- Having an older boyfriend or girlfriend
- Suffering from sexually transmitted infections or becoming pregnant If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Child-on-child abuse

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school. It can also take place both face-to-face and online, and can occur simultaneously between the 2. Our setting has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are there no reports, that doesn't mean that this kind of abuse isn't happening. Child-on-child abuse is most likely to include, but may not be limited to:

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse')
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)

- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element) Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content. If staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our setting's approach to this type of abuse.

When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognise that children displaying harmful sexual behaviour have often experienced their own abuse and trauma, and will offer them appropriate support.

Domestic abuse

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims. Older children may also experience and/or be the perpetrators of domestic abuse and/or violence in their own personal relationships. This can include sexual harassment. Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, development and ability to learn. If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day. The DSL will provide support according to the child's needs and update records about their circumstances.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL and deputy will be aware of contact details and referral routes in to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures). Where a child has been harmed or is at risk of harm, the DSL will also make a referral to local authority children's social care.

So-called 'honour-based' abuse (including FGM and forced marriage)

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators. All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures. FGM The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM. Section 7.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM. Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues
- A girl:
- Having difficulty walking, sitting or standing, or looking uncomfortable
- Finding it hard to sit still for long periods of time (where this was not a problem previously)
- Spending longer than normal in the bathroom or toilet due to difficulties urinating
- Having frequent urinary, menstrual or stomach problems
- Avoiding physical exercise or missing PE
- Being repeatedly absent from school, or absent for a prolonged period
- Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
- Being reluctant to undergo any medical examinations
- Asking for help, but not being explicit about the problem
- Talking about pain or discomfort between her legs Potential signs that a pupil may be at risk of FGM include:
- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- A girl:
- Having a mother, older sibling or cousin who has undergone FGM
- Having limited level of integration within UK society
- Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
- Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period
- Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
- Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
- Being unexpectedly absent from school
- Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication The above indicators and risk factors are not intended to be exhaustive. Forced marriage Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of 1 or both parties and where violence, threats, or any other form of

coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

It is also illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not involved. Staff will receive training around forced marriage and the presenting symptoms. We are aware of the '1 chance' rule, i.e. we may only have 1 chance to speak to the potential victim and only 1 chance to save them. If a member of staff suspects that a pupil is being forced into marriage, they will speak to the pupil about their concerns in a secure and private place. They will then report this to the DSL. The DSL will:

- Speak to the pupil about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmu@fco.gov.uk
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

Preventing radicalisation

- Radicalisation refers to the process of a person legitimising support for, or use of, terrorist violence
- Extremism is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:
    - o Negate or destroy the fundamental rights and freedoms of others; or
    - o Undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
    - o Intentionally create a permissive environment for others to achieve the results outlined in either of the above points
- Terrorism is an action that:
- Endangers or causes serious violence to a person/people;
- Causes serious damage to property; or
- Seriously interferes or disrupts an electronic system The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause. The government website Educate Against Hate and charity NSPCC say that signs that a pupil is being radicalised can include:
- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on social media or other online platforms
- Possessing extremist literature

- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations Children who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong. Staff should always take action if they are worried.

Sexual violence and sexual harassment between children

Sexual violence and sexual harassment can occur:

- Between 2 children of any age and sex
- Through a group of children sexually assaulting or sexually harassing a single child or group of children
- Online and face to face (both physically and verbally) Sexual violence and sexual harassment exist on a continuum and may overlap. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting any form of abuse or neglect. Nor should a victim ever be made to feel ashamed for making a report. When supporting victims, staff will:
- Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them
- Regularly review decisions and actions, and update policies with lessons learnt
- Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns
- Consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again
- Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual and transgender (LGBT) children are at greater risk. Staff should be aware of the importance of:
- Challenging inappropriate behaviours
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our settingl's approach to this type of abuse.

Serious violence

Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:

- Change in friendships or relationships with older individuals or groups
- Significant decline in performance
- Signs of self-harm or a significant change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above)) Risk factors which increase the likelihood of involvement in serious violence include:

- Being male
- Having been frequently absent or permanently excluded from school
- Having experienced child maltreatment
- Having been involved in offending, such as theft or robbery Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, they will report this to the DSL.

Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff and to leave their belongings, including their mobile phone(s), in a safe place during their visit. If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification. Visitors to the setting who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and:

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out (if this is provided, we will not ask to see the DBS certificate) All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the school any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

Document update note - September 2026

This revision incorporates the substantive safeguarding changes identified in Annex C of Keeping Children Safe in Education 2026 and relevant changes in Working Together to Safeguard Children 2026. It also adds ABA Pathways-specific safeguards for SEND communication, alternative provision, respite, transport, overnight support, personal care and restrictive intervention. Operational procedures should be reviewed alongside this policy to ensure they remain consistent with the policy wording.