Aurora

Child Protection and Safeguarding Policy

Policy Reference:	A1
Version Number:	11
Applies to:	All services
Associated documents:	Positive Relationship and Engagement Support Policy
	Safer Working Practices incorporating code of conduct
	Complaints Policy
	Health and Safety Policy
	Attendance Policy
	IT & Acceptable Use Policies
	Relationship & Sex Education Policy
	First aid Policy
	Curriculum Policy
	Privacy notices
	Equality, Diversity and Inclusion Policy
	Onboarding Policy
	Managing Allegations Against Staff Policy
	Child Protection Local Procedures
Author:	Group Safeguarding Lead
Approved by:	Incident and Safeguarding Committee
Implementation date:	September 2025
Next review due by:	September 2026
This policy has been reviewed to ensure it promotes safeguarding and does not present barriers to participation or disadvantage any protected groups	

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0. Summary of changes since previous version of policy

Full policy review as a result of updated KCSIE 2025 – please ensure you read, understand and adhere to this version and discard any older versions.

- Definitions:
    - ➢ The 4 C's of on-line safety content, contact, conduct and commerce: now includes under content misinformation, disinformation (including fake news) and conspiracy theories.

- Making or sharing of images now includes AI generated images.

1. Important contacts: Please refer to the Service Local Procedures

2. Aims

Aurora aims to ensure that:

Appropriate action is taken in a timely manner to safeguard and promote children's welfare.

All staff are aware of their statutory responsibilities with respect to safeguarding.

Staff are properly trained in recognizing and reporting safeguarding issues.

3. Legislation and statutory requirements

This policy is based on the Department for Education's statutory guidance

Keeping children safe in education 2025and the Governance Handbook. We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

This policy is also based on the following legislation:

- Part 3 of the schedule to the Education (Independent School Standards) Regulations 2014, which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school

Generative AI: product safety expectations - GOV.UK which sets out the capabilities and features which should be in place for users in educational settings.

Working together to improve school attendance - GOV.UK statutory guidance which sets out expectations and actions required to maintain high levels of attendance.

Relationships and sex education (RSE) and health education - GOV.UK sets out requirements for RSE & health education as from September 2026.

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

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

Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM

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

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

Statutory guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism

The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR)

The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means those acting in a position of governance and the headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it's proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment

Where pupils are aged under 8:

The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (referred to in this policy as the "2018 Childcare Disqualification Regulations") and Childcare Act 2006, which set out who is disqualified from working with children

Where early years provision is offered:

This policy also meets requirements relating to safeguarding and welfare in the statutory framework for the Early Years Foundation Stage.

Please see section 18 for locally agreed multi-agency procedures that have been put in place by the Local Safeguarding Children Partnership (LSCP)/ 3 safeguarding partners.

3a. Scope

This policy should be implemented for children who are under the age of 18. There is a separate Safeguarding Adults Policy.

4. Roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and those acting in a governance capacity in the service and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended service and off-service activities.

Our services play a crucial role in preventative education. This is in the context of a holistic approach to preparing children for life in modern Britain, and a culture of zero tolerance culture of sexism, misogyny/misandry, homophobia, biphobia transphobia, and sexual violence/harassment. This will be underpinned by our:

Positive Relationship and Engagement Support Policy

Pastoral support system

Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:

- o   Healthy and respectful relationships

- o   Boundaries and consent

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- Stereotyping, prejudice and equality

- Body confidence and self-esteem

- How to recognise an abusive relationship (including coercive and controlling behaviour)

- The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and female genital mutilation (FGM) and how to access support

- What constitutes sexual harassment and sexual violence and why they're always unacceptable

4.1 All staff

All staff will

- read and understand part 1 and Annex B of the Department for Education's statutory safeguarding guidance, [Keeping children safe in education 2025](#)and review this guidance at least annually, undertaking annual online KCSIE training.
- sign a declaration at the beginning of each academic year to say that they have reviewed the guidance, that they understand it and that they will adhere to it
- recognise that children have an increased risk of online and offline abuse.

- reinforce the importance of online safety when communicating with parents. This includes making parents aware of what we ask children to do online (e.g. services they need to visit or who they'll be interacting with online)

- ensure they understand the online safety training provided by Aurora that raises awareness of the expectations, applicable to roles and responsibilities in relation to IT filtering and monitoring as part of their wider safeguarding and child protection training.

- provide a safe space for pupils who are LGBTQ+ to speak out and share their concerns

All staff will be aware of:

Our systems which support safeguarding, including this child protection and safeguarding policy, the Safer Working Practices incorporating code of conduct, the role and identity of the designated safeguarding lead (DSL) and their deputies (DDSL'S), the Positive Relationship and Engagement Support Policy, the online safety policy, the safeguarding response to children who are absent from education and those who go missing from education and how to use the MyConcern/CPOMS system.

The early help process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL/DDSL, and sharing information with other professionals to support early identification and assessment

The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play

What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals

- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)

The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe

The fact that children can be at risk of harm inside and outside of their home, at school and online

The fact that children who are (or who are perceived to be) lesbian, gay, bi or trans (LGBT) can be targeted by other children

What to look for to identify children who need help or protection

Section 15 &18 of this policy and our HR policies - A142 Managing Allegations Against Staff Policy outline in more detail how staff are supported to do this.

4.2 The designated safeguarding lead (DSL)

The DSL is a member of the senior leadership team. Our DSL is named in the important contacts sheet, 'Child Protection Local Procedures' document accompanying this policy. The DSL takes lead responsibility for child protection and wider safeguarding but is supported by deputy safeguarding leads (DDSL's), who are trained to the same level and are interchangeable for the purposes of Safeguarding tasks. The DSL maintains oversight of safeguarding and child protection procedures at each service.

During term time, the DSL/DDSL's in education provision, will be available during service hours for staff to discuss any safeguarding concerns. In residential provision the DSL/DDSL will generally be available during the day shift and cover provided overnight, details can be found in the local procedures in section 18.

Details of how the DSL/DDSL's can be contacted out of hours if necessary is outlined in the 'Child Protection Local Procedures' document.

When the DSL is absent, the deputies outlined is outlined in the 'Child Protection Local Procedures' document will act as cover.

If the DSL and deputies are not available, the Operations Director named as outlined in the 'Child Protection Local Procedures' document, will act as cover (for example, during out-of-hours/out-of-term activities).

The DSL/DDSL's will be given the time, funding, training, resources and support to:

Provide advice, support and training to other staff on child welfare and child protection matters

Take part in strategy discussions and inter-agency meetings and/or support other staff to do so

Contribute to the assessment of children

Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly

Review MyConcern/CPOMS and ensure it is up to date and completed correctly – New cases should be triaged and allocated to a case manager within 2 hours wherever possible. Open cases should be reviewed at least weekly with updates recorded. When a case is closed the DSL must ensure all fields have been fully completed and that the narrative, chronology and all actions are clear and robust.

Have a good understanding of harmful sexual behaviour and be able to signpost to Shore Spaces, developed by the Lucy Faithfull Foundation.

The DSL/DDSL will also:

- Keep the headteacher/service lead informed of any issues and all LADO referrals.

- Liaise with local authority case managers and designated officers for child protection concerns as appropriate

- Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the service's local procedures and policies

- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support

- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search

- Reviews the filtering and monitoring processes and takes the lead to ensure they remain an effective tool in safeguarding and child protection.

- Gives special consideration for children who may be absent or missing from education and/or with repeated, persistent absences, who maybe at greater risk of harm.

- Will ensure any allegations towards an individual or 3ʳᵈ party user of the school premises are treated in the same way as any other allegation, through following Aurora safeguarding policies and procedures and informing the LADO

The full responsibilities of the DSL and deputies are set out in their job description.

4.3 The Operations Director

Facilitate a whole-service approach to safeguarding, ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development

Will evaluate and approve the local procedures at each review, ensure they comply with the law and hold the Head teacher/Service Lead to account for its implementation.

Review online safety training and hold the service lead to account to ensure all staff receive effective online safety training. Will monitor the effectiveness of this policy in conjunction with those acting in a governance role at the service. This is always a different person from the DSL.

Will review MyConcern/CPOMSon a monthly basis and hold service leads to account where it is not up to date or records indicate non-compliance.

Will act as the 'investigating manager' or appoint an appropriate 'investigating manager' in the event that an allegation of abuse is made against the head teacher/Service Lead, where appropriate (see A142 Managing Allegations Against Staff Policy).

Will ensure those acting in a governance role read understand and adhere to Keeping Children Safe in Education.

Will provide safeguarding supervision to the DSL/DDSL's in their region

4.4 The Aurora Safeguarding Lead and Quality Assurance Director will:

Facilitate an Aurora wide approach to safeguarding, ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development

Will evaluate and approve the policy at each review, ensure it complies with the law and hold Service Leads to account for its implementation.

Will monitor the effectiveness of this policy.

Will review MyConcern/CPOMS on a monthly basis and hold service leads to account where it is not up to date or records indicate non-compliance.

Will present to the Incident and Safeguarding committee any trends, themes or concerns which require action.

Will chair the group DSL meeting on a half termly basis.

Will act as point of contact for advice, guidance and support on complex safeguarding matters.

Share lessons learnt from safeguarding to relevant personnel to improve practice

4.5 The Head teacher/Service Lead

The Head teacher/Service Lead is responsible for the implementation of this policy, including:

Ensuring that staff (including temporary staff) and volunteers:

- o Are informed of our systems which support safeguarding, including this policy, as part of their induction
- o Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect

Communicating this policy to parents when their child joins the school/college/home and via the website

Ensuring that the DSL/DDSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent

Reviewing MyConcern/CPOMS every two weeks and hold DSLs/deputies to account where it is not up to date or records indicate non-compliance.

Ensuring that all staff undertake appropriate safeguarding and child protection training, including specific online safety training and updating the content of the training regularly.

Ensuring that all staff understand their roles and responsibilities around filtering and monitoring of IT systems.

Retaining specific responsibility for overseeing the use of technology, mobile phones and cameras in the setting.

Ensuring there is special safeguarding consideration of children who may be absent or missing from education or who have repeated and persistent absences.

Acting as the 'disciplining and investigating manager', or appointing an appropriate 'investigating manager', in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see A142 Managing Allegations Against Staff Policy)

Ensuring the relevant staffing ratios are met, where applicable

Making sure each child in the Early Years Foundation Stage is assigned a key person where appropriate

Following the policy with regards to low level concerns, , ensuring they are reported and recorded within MyConcern/CPOMS.

Ensuring consultation with the local authority designated officer (LADO) if there is any doubt as to whether a safeguarding concern around staff conduct meets the harm threshold, and report all LADO referrals to the Operations Director via the central reporting up process within 24 hours.

4.6 The Executive Team and those holding a position of governance

will:

- Facilitate an Aurora-wide approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development

- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the service lead to account for its implementation

- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements

- Task the Operations Director to monitor the effectiveness of this policy in conjunction with the service's executive and associate governors. This is always a different person from the DSL

- Make sure:

  - The DSL/DDSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support and takes the lead responsibility for understanding the school's filtering and monitoring system in place as part of their role.

  - Online safety is a running and interrelated theme within the whole-service approach to safeguarding and related policies, with appropriate filtering and monitoring systems in place and review their effectiveness.

  - Review the DfE's filtering and monitoring standards and identify with IT what needs to be done to support the service to meet these standards

  - Ensure all staff understand the expectations of their roles and responsibilities in relation to filtering and monitoring as part of their safeguarding training.

- o The leadership team and relevant staff are aware of and understand the IT filters and monitoring systems in place, manage them effectively and know how to escalate concerns

- o The service has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). A142 Managing Allegations Against Staff policy covers this procedure.

- o That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised and can be more susceptible to online and offline abuse.

- Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the service's roll):

  - o Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed

  - o Make sure there are arrangements for the body to liaise with the service about safeguarding arrangements, where appropriate

  - o Make sure that safeguarding requirements are a condition of using the service's premises, and that any agreement to use the premises would be terminated if the other body fails to comply

All those in a position of governance will read Keeping Children Safe in Education in its entirety.

Section 16 of this policy has information on how governors are supported to fulfil their role.

5. Definitions

Safeguarding and promoting the welfare of children means:

Providing help and support to meet the needs of children as soon as problems emerge

Protecting children from maltreatment, whether that is within or outside the home, including online

Preventing impairment of children's mental and physical health or development

Ensuring that children grow up in circumstances consistent with the provision of safe and effective care

Taking action to enable all children to have the best outcomes in line with the outcomes

Child protection is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer significant harm.

Abuse, Neglect and Exploitation means:

Abuse is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.

Neglect is a form of abuse and 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. Appendix 1 defines neglect in more detail.

Sharing of nudes and semi-nudes to include AI & computer generated imagery, (also known as sexting or youth produced sexual imagery) is where children share nude or semi-nude images, videos or live streams.

Children includes everyone under the age of 18.

Disclosure We use this terminology when recording a concern without making any judgement as to the accuracy of the information shared by the child or young person.

The 3 safeguarding partners are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- The local authority (LA)

- Integrated care boards (previously known as clinical commissioning group) for an area within the LA

- The chief officer of police for a police area in the LA area

Victim is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim, or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

Alleged perpetrator(s) and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

6. Equality statement

6.1 Some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

6.2 We give special consideration to children who:

Have special educational needs (SEN) or disabilities or health conditions (see section 11)

Are young carers

May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality

Have English as an additional language

Has experienced multiple suspensions andis at risk of or has been permanently excluded from schools.

Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence

Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation

Are asylum seekers

Are at risk due to either their own or a family member's mental health needs

Are looked after or previously looked after (see section 13)

Have unexplained and/or persistent absence from education or who have repeated absences

Are missing/goes missing from education, home or care.

Whose parent/carer has expressed an intention to remove them from school to be home educated

Has a parent or carer in custody or is affected by parental offending.

7. Confidentiality

7.1 The Aurora Group is committed to conducting its business in accordance with all applicable Confidentiality and Data Protection laws and regulations and in line with the highest standards of ethical conduct. Staff should refer to the Aurora Confidentiality Policy, Data Protection Policy and their associated forms and guidance.

7.2 Aurora recognises:

Timely information sharing is essential to effective safeguarding

Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children

The Data Protection Act (DPA) 2018 and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe

If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk

Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests

If a victim asks the service not to tell anyone about the sexual violence or sexual harassment:

- o There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies

- o The DSL/DDSL will have to balance the victim's wishes against their duty to protect the victim and other children

- o The DSL/DDSL should consider that:

    - Parents or carers should normally be informed (unless this would put the victim at greater risk)

    - The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care

    - Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains

Regarding anonymity, all staff will:

- o Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system

- o Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved

- o Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities

The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information (see Aurora Data Protection Policy)

If staff are in any doubt about sharing information, they should speak to the designated safeguarding lead (or deputy)

7.3 Confidentiality is also addressed in this policy with respect to record-keeping in section 15, and A142 Managing Allegations Against Staff policy.

8. Recognising abuse and taking action

Staff and volunteers must follow the procedures set out below in the event of a safeguarding issue.

Please note – in this and subsequent sections, you should take any references to the DSL to mean "the DSL (or deputy DSL)".

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

Tell your DSL/DDSL **immediately**, they will make a referral to children's social care or the police. If a DSL is not available, **make a referral to children's social care and/or the police immediately** if you believe a child is suffering or likely to suffer from harm, or in immediate danger. **Anyone can make a referral.**

Tell the DSL/DDSL (see section 8.2) as soon as possible if you make a referral directly.

See section 18 Local Procedures for making a referral, as per the arrangements put in place by the LCSB/3 safeguarding partners

Guidance on how to refer to a local council can be found here: https://www.gov.uk/report-child-abuse-to-local-council

8.2 If a child tells you something of concern to you, you should:

Listen to and believe them. Allow them time to talk freely and do not ask leading questions

Stay calm and do not show that you are shocked or upset

Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner

Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret

Write up your conversation (this can be done directly on MyConcern/CPOMS or written up as a note and scanned) as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it. The written notes should be kept securely by the DSL or destroyed securely once these have been uploaded.

Sign and date the write-up and upload it to MyConcern/CPOMS or pass it on to the DSL. Alternatively, if appropriate, make a referral to children's social care and/or the police directly (see 8.1), and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process

Report via MyConcern/CPOMS as soon as possible.

Bear in mind that some children may:

- Not feel ready, or know how to tell someone that they are being abused, exploited or neglected
- Not recognise their experiences as harmful
- Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers

None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child.

8.3 If you discover that FGM has taken place or a child is at risk of FGM

Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.

Possible indicators that a child has already been subjected to FGM, and factors that suggest a child may be at risk, are set out in appendix 4.

Any regulated health and social care professional or teacher who either:

- Is informed by a girl under 18 that an act of FGM has been carried out on her; or

- Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth

Must immediately report this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

Unless they have been specifically told not to disclose, they should also discuss the case with the DSL/DDSL, report via MyConcern/CPOMS and involve children's social care as appropriate.

Any other member of staff who discovers that an act of FGM appears to have been carried out on a **child under 18** must speak to the DSL and follow our local safeguarding procedures.

The duty for teachers mentioned above does not apply in cases where a child is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine children.

Any member of staff who suspects a child is *at risk* of FGM or suspects that FGM has been carried out or discovers that a young person **age 18 or over** appears to have been a victim of FGM should speak to the DSL/DDSL and follow our local safeguarding procedures.

Local procedures are detailed in section 18

8.4 If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)

Figure 1 below illustrates the procedure to follow if you have any concerns about a child's welfare.

Report via MyConcern/CPOMS and where possible, speak to the DSL/DDSL first to agree a course of action.

If in exceptional circumstances the DSL/DDSL or another member of the safeguarding team is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL/DDSL as soon as practically possible.

Make a referral to local authority children's social care directly, if appropriate (see 'Referral' below). Share any action taken with the DSL/DDSL as soon as possible.

Early help

Early help is support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse.

If early help is appropriate, the DSL/DDSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

We will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment, as part of local arrangements.

The DSL/DDSL will keep the case under constant review and the service will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

Any local procedures for early help can be found in section 18

Referral

The DSL/DDSL will make a referral where appropriate. If the DSL or a member of the safeguarding team is unavailable, you should refer the case to local authority children's social care or the police. If you make a referral directly (see section 7.1), you must tell the DSL as soon as possible. Where a DSL is not available, the Operations Director or Group Safeguarding Lead should be informed and will be able to support.

The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL/DDSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

Local procedures for referral and escalation can be found in section 18.

8.5 If you have concerns about extremism

If a child is not suffering or likely to suffer from harm, or in immediate danger, Report via MyConcern/CPOMS and where possible speak to the DSL/DDSL first to agree a course of action.

If in exceptional circumstances the DSL/DDSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). Inform the DSL or deputy as soon as practically possible after the referral.

Where there is a concern, the DSL/DSL will consider the level of risk and decide which agency to make a referral to. This could include the police or Channel, the government's programme for identifying and supporting individuals at risk of becoming involved with or supporting terrorism, or the local authority children's social care team.

The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which service staff and governors can call to raise concerns about extremism with respect to a child. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

Think someone is in immediate danger

Think someone may be planning to travel to join an extremist group

See or hear something that may be terrorist-related

8.6 If you have a mental health concern

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 8.4.

If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree a course of action who can refer to your service's local arrangements for identifying and supporting individuals who may have possible mental health problems

See the Department for Education guidance on [mental health and behaviour in schools](#) for more information.

8.7 Concerns about a staff member, supply teacher, volunteer or contractor

If you have any concerns about a member of staff (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) posing a risk of harm to children, speak to the head teacher/service lead as soon as possible and record on our **Confide** our system for recording low level staff concerns. It may not be apparent in the early stages how significant the incident or behaviour is when considered holistically with another concern or an accumulation of concerns. If the concerns/allegations are about the head teacher/service lead, speak to the Operations Director.

The Managing Allegations Against Staff Policy (A142) gives more detail about concerning behaviours.

The service lead/operations director will then follow the procedures set out in A142 Managing Allegations Against Staff Policy, if appropriate.

Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, volunteer or contractor) internally, report it directly to the local authority designated officer (LADO). If there is any doubt as to whether a safeguarding concern around staff conduct meets the harm threshold the LADO should be consulted, this referral should be reported up to the Operations Director within 24 hours.

Aurora

Figure 1: procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)

Does the concern relate to staff actions or lack of? Report the concern via 'Confide' and speak to your service Lead

If you have a concern, submit via MyConcern

Speak to or call you DSL/DDSL if immediate action if required.

DSL/DDSL to triage the concern within 2 hours, adding case owner, categories and actions taken

The DSL/DDSL (or you*) makes a referral to the LA's social care team/MASH/1st Response teams or police if appropriate and reports up

If a concern remains open the DSL/DDSL needs to update within MyConcern every 7 days.

Within one working day, a social worker makes a decision about the type of response required.

Concerns within MyConcern are to be closed as soon as practicable.

External agencies take action and informs referrer.

No formal assessment required.

DSL undertakes an audit of concerns within MyConcern at least every month.

DSL/DDSL and team consider other support or interventions required.

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8.8 Allegations of abuse made against other pupils/students/young people.

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up" as this can lead to a culture of unacceptable behaviours and an unsafe environment for children.

We also recognise the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously.

Most cases of children hurting other children will be dealt with under our service's behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

Is serious, and potentially a criminal offence

Could put children/young people in the service at risk

Is violent

Involves children/young people being forced to use drugs or alcohol

Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

See Appendix 2 for more information about child-on-child abuse.

Procedures for dealing with allegations of child-on-child abuse:

You must record the allegation on MyConcern/CPOMS and tell the DSL/DDSL, but do not investigate it

The DSL/DDSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence

The DSL/DDSLwill put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering school/service transport as a potentially vulnerable place for a victim or alleged perpetrator(s)

The DSL/DDSL will contact the children and adolescent mental health services (CAMHS), if appropriate

If the incident is a criminal offence and there are delays in the criminal process, the DSL/DDSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

Creating a supportive environment and minimising the risk of child-on-child abuse

We recognise the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

To achieve this, we will:

Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images

Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys

Ensure our curriculum helps to educate children about appropriate behaviour and consent

Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners

Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed

- Consider intra familial harms and any necessary support for siblings following a report of sexual violence and/or harassment

Ensure children are able to easily and confidently report abuse using our reporting systems (as described in section 8.10 below)

Ensure staff reassure victims that they are being taken seriously

Ensure staff are trained to understand:

- o How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports

- o That even if there are no reports of child-on-child abuse, it does not mean it is not happening – staff should maintain an attitude of "it could happen here"

- o That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:

  - Children can show signs or act in ways they hope adults will notice and react to

  - A friend may make a report

  - A member of staff may overhear a conversation

  - A child's behaviour might indicate that something is wrong

- o That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation

- o That a child harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy

- o The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it

- o That they should speak to the DSL/DDSL if they have any concerns

- o That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side

The DSL/DDSL will take the lead role in any disciplining of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action.

Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident doesn't (in itself) prevent our school from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:

Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or LA children's social care to determine this

- o There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing

8.9 Sharing of nudes and semi-nudes ('sexting')

Aurora bases its policy on guidance from the UK Council for Internet Safety for all staff and for DSLs and senior leaders.

Your responsibilities when responding to an incident.

Aurora

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos including those that are computer generated (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL/DDSL immediately and record this on MyConcern/CPOMS.

You must **not**:

View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DS/DDSL)

Delete the imagery or ask the pupil to delete it

Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL/DDSL's responsibility)

Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers

Say or do anything to blame or shame any young people involved

You should explain that you need to report the incident and reassure the pupil(s) that they will receive support and help from the DSL/DDSL.

Initial review meeting

Following a report of an incident, the DSL/DDSL will hold an initial review meeting with appropriate staff.

This meeting will consider the initial evidence and aim to determine:

Whether there is an immediate risk to child(ren)

If a referral needs to be made to the police and/or children's social care

If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)

What further information is required to decide on the best response

Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)

Whether immediate action should be taken to delete or remove images or videos from devices or online services

Any relevant facts about the children involved which would influence risk assessment

If there is a need to contact another school, college, setting or individual

Whether to contact parents or carers of the children involved (in most cases parents/carers should be involved)

The DSL/DDSL will make an immediate referral to police and/or children's social care if:

The incident involves an adult

There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)

What the DSL/DDSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent

The imagery involves sexual acts and any pupil in the images or videos is under 13

The DSL/DDSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL/DDSL, in consultation with the head teacher/service lead and other members of staff as appropriate, may decide to respond to the incident without involving the police

or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

Further review by the DSL

If at the initial review stage, a decision has been made not to refer to police and/or children's social care, the DSL/DDSL will conduct a further review to establish the facts and assess the risks.

They will hold interviews with the children/young people involved (if appropriate).

If at any point in the process there is a concern that a child/young person has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

Informing parents/carers

The DSL/DDSL will inform parents/carers at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the pupil at risk of harm.

Referring to the police

If it is necessary to refer an incident to the police, this will be done through by following local procedures in section 18.

Recording incidents

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 15 of this policy also apply to recording these incidents.

Curriculum coverage

Children/young people are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our Relationships and Sex Education and E-safety lessons. Teaching covers the following:

What it is

How it is most likely to be encountered

The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment

Issues of legality

The risk of damage to people's feelings and reputation

Children also learn the strategies and skills needed to manage:

Specific requests or pressure to provide (or forward) such images

The receipt of such images

This policy on the sharing of nudes and semi-nudes including computer generated images, is also shared with pupils so they are aware of the processes the service will follow in the event of an incident.

8.10 Reporting systems for our children

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.

We recognise the importance of ensuring children feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we will:

Put systems in place for children to confidently report abuse

Ensure our reporting systems are well promoted, easily understood and easily accessible for children

Make it clear to children that their concerns will be taken seriously, and that they can safely express their views and give feedback

See local procedures in section 18 for specific service support.

9. Online safety and the use of mobile technology

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, we aim to:

Have robust processes in place to ensure the online safety of children, staff, volunteers and visitors

Protect and educate the Aurora community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')

Set clear guidelines for the use of mobile phones for the whole Aurora community

Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

The 4 key categories of risk

Our approach to online safety is based on addressing the following categories of risk:

Content – being exposed to illegal, inappropriate or harmful content, such as pornography, misinformation (fake news), disinformation, conspiracy theories, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.

Contact – being subjected to harmful online interaction with other users, such as child-on-child pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes

Conduct – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and

Commerce – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

To meet our aims and address the risks above we will:

Educate children about online safety as part of our curriculum. For example:

- o The safe use of social media, the internet and technology
- o Keeping personal information private
- o How to recognise unacceptable behaviour online
- o How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim

Train staff, as part of their induction, on safe internet use and online safety and safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year

Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them, so they know how to raise concerns about online safety

Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:

- o Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present

      ○   Staff will not take pictures or recordings of pupils on their personal phones or cameras

Make all children, parents/carers, staff and volunteers aware that they are expected to sign an agreement regarding the acceptable use of the internet, use of Aurora's ICT systems and use of their mobile and smart technology

Explain the sanctions we will use if a child is in breach of our policies on the acceptable use of the internet and mobile phones

Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the DfE's guidance on searching, screening and confiscation

Filtering and monitoring

Aurora has in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from Aurora's IT systems which adheres to the DfE filtering and monitoring standards and as such the systems meet those standards as required by a member of Internet Watch Foundation (IWF)
We are signed up to Counter-Terrorism Internet Referral Unit list (CTIRU) and block access to illegal content including child sexual abuse material (CSAM) .

Aurora Uses Barracuda Content Shield for web filtering, we also have Senso.Cloud that adds an extra layer of device monitoring and security both meet the parameters of this section.

This enables our filtering system monitor to all users, including guest accounts, school owned devices and devices using the school broadband connection.

Monitoring:
Aurora filters all internet feeds, including any backup connections, be age and ability appropriate for the users, and be suitable for educational settings, handle multilingual web content, images, common misspellings and abbreviations, identify technologies and techniques that allow users to get around the filtering such as VPNs and proxy services and block them, provide alerts when any web content has been blocked.

The systems also allow us to identify device name or ID, IP address, and where possible, the individual, the time and date of attempted access, the search term or content being blocked

Barracuda along with Senso meet all the above requirements. Aurora has safe search on all of its devices and limit access to the edge browser.

All staff are aware of reporting mechanisms for safeguarding and technical concerns. They should report if they witness or suspect unsuitable material has been accessed.

Aurora carries out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by the Aurora community

This section summarises our approach to online safety and mobile phone use. For comprehensive details about our service's policy on online safety and the use of mobile phones, please refer to our Online Safety Policy and our IT Acceptable Use Policy.

Artificial intelligence (AI)

Generative artificial intelligence (AI) tools are now widespread and easy to access. Staff, pupils and parents/carers may be familiar with generative chatbots such as ChatGPT and Google Bard.

We recognises that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard pupils. However, AI may also have the potential to facilitate abuse (e.g. bullying and grooming) and/or expose pupils to harmful content. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real.

We will treat any use of AI to access harmful content or bully pupils in line with this policy and our Anti-bullying and Positive Relationship and Engagement Support policies.

Staff should be aware of the risks of using AI tools whilst they are still being developed and should carry out risk assessments for any new AI tool being used by the school.

Aurora

10. Notifying parents or carers

Where appropriate, we will discuss any concerns about a child with the child's parents or carers. The DSL/DDSL will normally do this in the event of a suspicion or disclosure.

Other staff will only talk to parents or carers about any such concerns following consultation with the DSL/DDSL.

If we believe that notifying the parents or carers would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved. We will think carefully about what information we provide about the other child involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.

The DSL/DDSL will, along with any relevant agencies (this will be decided on a case-by-case basis):

- Meet with the victim's parents or carers, with the victim, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed
- Meet with the alleged perpetrator's parents or carers to discuss support for them, and what's being put in place that will impact them, e.g. moving them out of classes/groups with the victim, and the reason(s) behind any decision(s)

11. Children with special educational needs, disabilities or health issues

We recognise that children with special educational needs (SEN) or disabilities or certain health conditions can face additional safeguarding challenges. Children with disabilities are more likely to be abused than their peers. Additional barriers can exist when recognising abuse, exploitation and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- Children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils
- The potential for children with SEN, disabilities or certain health conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these challenges
- Cognitive understanding may be a barrier to recognising they are being abused or able to report instances of abuse.

12. Children and young people with a social worker

Children and young people may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to engagement, attendance to education, learning, behaviour and mental health.

The DSL and all members of staff will work with and support social workers to help protect vulnerable children.

Where we are aware that a child/young person has a social worker, the DSL/DDSL will always consider this fact to ensure any decisions are made in the best interests of the child's safety, welfare, care and educational outcomes. For example, it will inform decisions about:

Responding to unauthorised repeated or persistent absences or missing from education where there are known safeguarding risks. Each school will work with the local authority to monitor and review attendance.

The provision of pastoral and/or academic support

13. Looked-after and previously looked-after children

We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:

Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements

The DSL/DDSL has details of children's social workers and relevant virtual school heads

We have appointed an appropriately trained teacher, to take the lead on promoting the educational achievement of looked-after and previously looked-after children.

As part of their role, they will:

Work closely with the DSL/DDSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to

Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children

14. Complaints and concerns about service safeguarding policies

14.1 Complaints against staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see A142 Managing Allegations Against Staff Policy).

14.2 Low level concerns

The term 'low level' concern does not mean that it is insignificant, it means that the adult's behaviour towards a child or adult at risk does not meet the harm threshold as set out in this policy. A low level concern is any concern, no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult may have acted in a way that is inconsistent with an organisation's values or code of conduct. This will include inappropriate conduct outside of work

All such concerns should be recorded to Confide and raised with the Service Lead in line with our A142 Managing allegations against staff policy.

14.3 Other complaints

Other complaints will be handled in accordance with Aurora's Complaints Policy

14.4 Whistle-blowing

Staff are able to refer to Aurora's Whistleblowing policy. Posters advertise this service in staff communal areas and the policy and contact details can be found on Sharepoint

General guidance on whistleblowing can be found at: Advice on whistleblowing https://www.gov.uk/whistleblowing. The NSPCC whistleblowing helpline is also available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028

0285. The line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: help@nspcc.org.uk.

14.5 Allegations against 3rd party using the service's premises

The school will follow safeguarding procedures and inform the LADO if there is an allegation of an incident happening while an individual or third party organisation is using the service's premises to run activities for children outside of the school day.

15. Record-keeping

We will hold records in line with our records retention schedule.

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing on MyConcern/CPOMS. If you are in any doubt about whether to record something, discuss it with the DSL/DDSL.

Records will include:

- A clear and comprehensive summary of the concern

- Details of how the concern was followed up and resolved

- A note of any action taken, decisions reached and the outcome

- Where referrals were or were not made to another agency such as local authority children's social care or the Prevent programme etc.

- The rationale for closing the case

Non-confidential records will be easily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them, as specified below.

Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school/college/home.

If a child who has, or has had, safeguarding concerns moves to another service/school, the DSL will ensure that their child protection file is forwarded as soon as possible and separately from the main pupil/information file, adhering to the following secure process:

- DSL keeps any hard copy safeguarding files in a secure & locked filing cabinet/cupboard with restricted access to DSL and service lead. The DSL retains ownership and responsibility of these files at all times.

- Following a request to transfer to a new provider for example, the DSL makes arrangements with receiving DSL to hand deliver, or if too far away uses a secure courier/signed for mail service to transfer.

- These files need to be placed in a gusseted business envelope which is sealed and signed by the DSL across the opening and over sealed with additional Sellotape or similar.

- If using courier/mail services, proof of posting and delivery is required, if hand delivering, the parcel needs to be signed for by the receiving DSL.

- If for any reason safeguarding files from MyConcern/CPOMS are printed as PDF's the same process is to be followed. Electronic transfer needs to be encrypted/password protected and securely sent to a named DSL email, not an open group email, unless a CFT system is used.

To allow the new school/college/service to have support in place when the child arrives, this should be within:

5 days for an in-year transfer, or within **the first 5 days** of the start of a new term

In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

Records are kept electronically on the MyConcern/CPOMS system

Where records need to be kept in paper document form these will be held securely (in a locked cabinet) by the DSL and only accessed when authority given. Concerns and referrals will be kept in a 'separate child protection file' for each child

All staff may report on MyConcern/CPOMS and access their records. Access to all other aspects of the system are restricted to those holding a safeguarding role in the service (Service Lead/DSL/Deputy DSL/Operations Director/Quality Assurance Director)

The MyConcern/CPOMS system has security assurances built in and access is secured by password

The DSL/DDSL shares information with other agencies verbally or by encrypted email when this is appropriate.

15.1. Photographing of Injuries in children

This covers the photographing of potentially suspicious bruising as well as accidental and existing injuries.

In terms of safeguarding and child protection practice, it is not appropriate for staff to take photos of children's injuries. The main reason for this is, that in such circumstances it is only deemed acceptable for photographs to be taken by the police, forensic or medical photographer.

There are a range of legal guidelines and regulations that must be met when taking such images and for submission to potential court cases.

An untrained person taking a photograph could mean it will be deemed inaccurate. Additionally, to take a close up of an injury, you are most likely going to be photographing one area of a child's body. This means that identification can become an issue, and one that could subsequently be disputed.

15.2. MyConcern for Aurora /CPOMS for R.E.A.L. Education

AuroraServices us MyConcern. R.E.A.L. Education services use CPOMS.

All concerns should be logged on the MyConcern/CPOMS system as soon as possible

Full details of how to use the system can be found on the MyConcern/CPOMS system and training will be provided on induction. Please also refer to the MyConcern/CPOMS guide or ask the Quality Team for further support.

All service staff must ensure they know how to log and update a concern.

The DSL/DDSL and deputies must ensure they know how to update, monitor, review and close a concern and how to identify and analyse patterns and trends.

When a concern is logged an email alert is sent by the system to the named service DSL and deputies

New concerns should be triaged by the DSL/DDSL or a deputy within 2 hours during service hours wherever possible, or as soon as possible out of hours. Residential services have more detail about DSL/DDSL 'out of hours' in their local procedures outlined in section 18

When triaged, the case will move to the open category. The DSL/DDSL should assign a case owner and identify categories of concern and record any actions taken.

Open cases should be reviewed frequently and updated at least weekly. Emails loaded into the chronology of a concern should include the sender/receiver details, date and time included in the evidence.

Open cases should be closed as soon as is practical

When closing a case the chronology should be reviewed and updated to ensure that the record is clear, robust and contains the evidence required/referred to within the report

The use of My Concern/Cpoms will be monitored by the Aurora Incident and Safeguarding Governance Board on a monthly basis.

15.3 Transport by taxi

For those services who have children and young people transported to and from School/College by taxi, the service lead and DSL/DDSL will undertake review of drivers documentation including identification details by sampling 10% of drivers each half term. In addition, the service lead will contact the local authority for confirmation they have completed safer recruitment checks on the names drivers ascertaining when these checks occurred. Any discrepancies are to be raised as a safeguarding matter.

16. Training

16.1 All staff

All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures and online safety (including awareness of expectations and responsibilities in relation to IT filtering and monitoring) , to ensure they understand the service's safeguarding systems and their responsibilities, and can identify signs of possible abuse, exploitation or neglect.

This training will be regularly updated and will:

Be integrated, aligned and considered as part of the Aurora-wide and whole service safeguarding approach and wider staff training, and curriculum planning

Be in line with advice from the 3 safeguarding partners

Have regard to the Teachers' Standards to support the expectation that all teachers:

- o Manage behaviour effectively to ensure a good and safe environment
- o Have a clear understanding of the needs of all children

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of becoming involved with or supporting terrorism and to challenge extremist ideas.

Staff will also receive regular safeguarding and child protection updates, including on online safety, as required but at least annually (for example, through emails, e-bulletins and staff meetings).

Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training.

Volunteers will receive appropriate training, if applicable.

16.2 The DSL and deputies

The DSL and deputies will undertake level 3 child protection and safeguarding training at least every 2 years.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSL/DDSL's, or taking time to read and digest safeguarding developments). Where possible Aurora recommends DSLs and Deputies attend Local Authority training.

They will also undertake Prevent awareness training.

16.3 Operations Directors/ those acting in a governance capacity

Operations Directors and those acting in a governance capacity receive online safeguarding and child protection (including online safety) at induction, which is regularly updated. This is to make sure that they:

- Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge

- Can be assured that safeguarding policies and procedures are effective and support the service to deliver a robust whole-school approach to safeguarding

Those named as Executive Governors will undertake level 3 child protection and safeguarding training at least every 2 years.

As the Operations Director may be required to act as the 'case manager' in the event that an allegation of abuse is made against the head teacher/service lead, they receive training in managing allegations for this purpose.

16.4 Recruitment – interview panels

At least one person conducting any interview for a post at the service will have undertaken safer recruitment training. This will cover, as a minimum, the contents of the Department for Education's statutory guidance, Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

For more information about our safer recruitment procedures please see A141 Recruitment Policy and A141.1 Onboarding Policy.

16.5 Staff who have contact with children and families

All staff who have contact with children and families will have supervisions which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

17. Monitoring arrangements

This policy will be reviewed **annually** by the Aurora Group Incident and Safeguarding Governance Committee. At every review, it will be approved by the full Executive Board. Local procedures will be reviewed **annually** by the Service Lead/Head teacher. At every review, it will be approved by the Operations Director.

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These appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education.

Appendix 1: types of abuse

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by one 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:

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

Seeing, hearing or experiencing the effects of domestic abuse

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.

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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.

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Appendix 2: specific safeguarding issues

<u>Please see section 18 where our local procedures highlight the issues below which have been risk assessed as most relevant to our service and any specific local support and procedures which apply.</u>

Assessing adult-involved nude and semi-nude sharing incidents

This section is based on annex A of the UK Council of Internet Safety's advice for education settings.

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

Children absent or missing from education or care

A child absent or missing from education, home or care, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a child may become absent from education, but some children are particularly at risk and all children who are absent from education require special consideration. These include children who:

Are at risk of harm or neglect

Are at risk of forced marriage or FGM

Come from Gypsy, Roma, or Traveller families

Come from the families of service personnel

Go missing or run away from home or care

Are supervised by the youth justice system

Cease to attend a school

Come from new migrant families

We will follow our procedures for unauthorised absence and for dealing with children who go missing from education or care, particularly on repeat occasions, to help identify the risk of abuse, exploitation and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being missing, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

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 absent school or education

- Not taking part in education

If a member of staff suspects CCE, they will discuss this with the DSL/DDSL. The DSL/DDSL 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 and online. It can also take place both face-to-face and online and can occur simultaneously between the 2.

Aurora has a zero-tolerance culture approach to sexual violence, sexual harassment and transphobia. 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 nudes and semi nudes 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 8 of this policy, as appropriate. In particular, section 8.8 and 9.9 set out more detail about our 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.

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.

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. 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.

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 at school/college (usually the designated safeguarding lead) before the child or children arrive the following day. This is the procedure where police forces are part of Operation Encompass

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/deputies will be aware of contact details and referral routes into 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 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 8.3 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 child confiding in a professional that FGM has taken place

- A mother/family member disclosing that FGM has been carried out

- A family/child 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 one 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 illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not used.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the 'one chance' rule, i.e. we may only have one chance to speak to the potential victim and only one 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/DDSL will:

- Speak to the child 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 child 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 vocal or active opposition to fundamental values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces

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.

We have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our school becoming involved with or supporting terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

We will ensure that suitable internet filtering is in place and equip our children to stay safe online at school/college and at home.

There is no single way of identifying an individual who is likely to be susceptible to radicalisation into terrorism. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in pupils' behaviour.

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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 Facebook or Twitter

- 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.

If staff are concerned about a child, they will follow our procedures set out in section 8.5 of this policy, including discussing their concerns with the DSL.

Staff should **always** take action if they are worried.

Sexual violence and sexual harassment between children in schools

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. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school.

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 sexual violence or sexual harassment. 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
- Consider signposting the young person to Shore Space

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 8.8 and 8.9 set out more detail about our 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:

Increased absence from school

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 may be asked 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 are expected to sign in and wear a visitor's badge.

Visitors to the school 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 service 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.

Use of Alternative Provisions

The full addresses of any alternative provision or sub-contracting provision use for individual or groups of pupils will be quality assured and risk assessed prior to use. In addition written confirmation from the provider which confirms all their staff have been fully safer recruited, will be required.

For Non – collection of Children and Absent Children - Please see the separate 'Service Local Procedures' document.

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Appendix 3: Investigation Report Template

STRICTLY CONFIDENTIAL

SAFEGUARDING INVESTIGATION REPORT

Investigation commissioned by: Name: Job Title:
Investigating Manager: Name: Job Title:
Additional Support: Name: Job Title:
Individual details of those involved in investigation: Name: DOB: Joined Service: Year Group:
Background *This may cover:* *· How did the issue come to light?* *· Have any other actions been taken prior to the investigation?*
Allegation/s *This may cover:* *· What specific allegations/concerns (by bullet points) were investigated? Be clear and concise. Where possible, give the date, time and place of the alleged incident.*

Investigation process

This may cover:
· A brief description of method(s) used to gather information
· Timeframes e.g. cover if any delays due to absence etc.
· Include rationale as to why a witness has not been interviewed
Chronology

Appendices

These should be attached and may include witness statements, investigatory interview notes, chronology of events etc.

Appendix	Document Title	Date
1	*e.g. Joe Bloggs Investigatory Interview Notes*	*01/01/2023*
2		
3		

Appendices should be numbered numerically as they appear in the report

Findings
This should cover:
· A comprehensive summary of findings and observations for each specific allegation/issue of concern investigated, cross-referencing any documentation where needed.

Other relevant information
If there is nothing that has not already been covered delete this section.

Conclusion
This may cover:
· For each concern/allegation investigated an overall opinion based 'on the balance of probabilities' on whether there is evidence to support allegations made
· No new evidence or information should be included here
What is the assessment of risk and harm

Recommendation
The investigator does not recommend what level of penalty is warranted. They should however recommend whether or not the case should proceed to a disciplinary hearing.

Recommendations can include:
·Actions required or individuals or the service
·There is sufficient evidence in support of the allegation/s to warrant consideration of further actions from the service

Investigator's Signature:

Date report completed:

18. Local Procedures

Each Aurora service has its own local safeguarding procedures which should be referred to where concerns need to be raised at a particular location. These include any locally agreed multi-agency procedures that have been put in place by the Local Children's Safeguarding Partnership / 3 safeguarding partners. For concerns which affect the organization, please contact the Group Safeguarding Lead – Kim Welsh or the Quality Assurance Director – Lesley Dalgleish.

As our services support children with special needs, they are more vulnerable to all forms of abuse as outlined in appendix 2. Communication barriers and negative experiences of education/care in the past may also make it harder for our children/families to disclose concerns. As such we use a range of approaches such as team meetings and briefings, progress reviews and ongoing work to develop strong and supportive relationships to review possible risks and signs of abuse. As an organisation we review patterns and themes in the concerns raised and have regular national DSL calls to identify and address any emerging areas of concern.

See separate 'Service Local Procedures' document <u>A1-(Service) Child Protection Local Procedures</u>