



Safeguarding and Child Protection Policy

Document Control			
Review period	12 Months	Next review	September 2026
Owner	CEO	Approver/date	

This document applies to all schools and operations of the Galileo Multi Academy Trust: www.galileotrust.co.uk

Policy Review Sheet	
Date of changes:	September 2025

Changes to note	Reason for change <i>e.g. change in legislation</i>
Citations updated throughout	KCSiE change in legislation 2025
Early Years Foundation Stage Framework requirements including training	EYFS change in legislation 2025
Online Safety	KCSiE change in legislation 2025
Pupils using mobile devices in school	KCSiE change in legislation 2025
4 Cs - Content wording	KCSiE change in legislation 2025
Artificial Intelligence (AI)	KCSiE change in legislation 2025
Reducing the need for restraint and restrictive intervention	KCSiE change in legislation 2025
Included personal mobile and image sharing devices	KCSiE change in legislation 2025
Update to Academy Trust Governance Guide	KCSiE change in legislation 2025
Included completion of Section 175 monitoring for the local authority	KCSiE change in legislation 2025
Included The Information Commissioner's Employment Practices Code	KCSiE change in legislation 2025
Children educated in alternative provision	KCSiE change in legislation 2025
Child Sexual Exploitation (CSE)	KCSiE change in legislation 2025
Children who are Lesbian, Gay, Bisexual, or gender questioning	KCSiE change in legislation 2025
Suspension and permanent exclusion guidance	KCSiE change in legislation 2025
Promoting the education of children with a social worker and children in kinship care arrangements	KCSiE change in legislation 2025
Opportunities to teach safeguarding	KCSiE change in legislation 2025
Mental Health	KCSiE change in legislation 2025
Operation Encompass	KCSiE change in legislation 2025
Extremism	KCSiE change in legislation 2025

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Policy Statement and Principles

Galileo Multi Academy Trust Board of Directors and individual Governing Bodies takes seriously its responsibility under [section 157 of the Education Act 2002](#), [The Children Acts 1989 \(as amended 2004 s52\)](#), [Part 3 of The Education \(Independent Schools Standards\) \(England\) Regulations 2014](#) and [Academy trust governance guide \(DfE 2024\)](#). We comply with the guidance and the procedures set out by the South Tees Safeguarding Children Partnership (STSCP), to safeguard and promote the welfare of children; and to work together with other agencies to ensure adequate arrangements within our schools to identify, assess, and support those children who are suffering harm.

This policy is one of a series in the Trusts integrated safeguarding portfolio. It acknowledges and is in line with the guidance detailed below. We expect Trust schools to reflect and comply with the guidance and the arrangements agreed and published by their three local safeguarding partners: The local authority (LA), The Integrated Care Board (ICB), The chief of police, funding agreements and articles of association.

Galileo Multi Academy Trust is committed to safeguarding and promoting the welfare of all its pupils and believes each pupil's welfare is of paramount importance. We recognise that all children are at risk, but some children may be at greater risk of abuse, neglect and exploitation, have additional barriers with recognising, disclosing or have an increased risk of abuse. We are committed to anti-discriminatory practice and recognise diverse circumstances and believe our children have equal rights to protection, regardless of sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (protected characteristics) have equal rights to protection.

We have special consideration to children who:

- Is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health, and Care Plan)
- has a mental health need
- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from care or from home
- is at risk of modern slavery, trafficking, sexual or criminal exploitation
- is at risk of being radicalised or exploited
- has a family member in prison, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol

- misuse, adult mental health issues and domestic abuse
- is misusing drugs or alcohol themselves
- has returned home to their family from care
- is at risk of 'honour'- based abuse such as Female Genital Mutilation or Forced Marriage
- live transient lifestyles, or live away from home or in temporary accommodation
- is a privately fostered child
- is persistently absent from education, including persistent absences for part of the school day

We acknowledge that children who are abused or neglected may find it difficult to develop a sense of self-worth and to view the world in a positive way. Whilst at school, their behaviour may be challenging. We recognise that some children who have experienced abuse may harm others. We will always take a considered and sensitive approach in order that we can support all our students or pupils.

Where the procedures contained in this policy refer to 'staff' this means all staff (paid or unpaid), volunteers, governors, supply staff, contractors and those working in and with school.

We ensure that everyone, working directly with children, reads at least Part one, Part five and Annex B of [Keeping Children Safe in Education](#), the School Staff Handbook, Safeguarding and Child Protection Policy, Behaviour Policy (which includes measures to prevent bullying including cyberbullying, prejudice-based and discriminatory bullying), understands their school's response to children who are absent from education and [What to do if you're worried a child is being abused](#). In addition, early years staff have regard to the [Early Years Statutory Foundation Framework](#). We fulfil our responsibilities by asking all staff to sign a declaration at the beginning of each academic year to say they have reviewed the guidance provided.

We also review and develop ongoing mechanisms to assist staff to understand and discharge their roles and responsibilities.

Our schools safeguarding arrangements are inspected by Ofsted under leadership and management.

Policy principles

- Safeguarding is everyone's responsibility
- A child-centred approach
- Welfare of the child is paramount
- All children, regardless of sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (protected characteristics), have equal rights to protection
- Pupils and staff involved in child protection issues will receive appropriate support

Policy aims

- To provide all Trust staff with the necessary training and information to enable them to meet their child protection responsibilities
- To ensure consistent good practice
- To demonstrate the Trust's commitment regarding safeguarding and child protection to pupils, parents, and other partners
- To contribute to the Trust's safeguarding portfolio

Keeping Children Safe in Education defines safeguarding as:

- providing help and support to meet the needs of children as soon as problems emerge.
- protecting children from maltreatment, whether this 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

Child protection: part of safeguarding and promoting welfare. This refers to the activity that is undertaken to protect specific children who are suffering, or likely to suffer, significant harm.

Abuse: A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults, or another child or children.

Children: Includes everyone under the age of 18. The fact that a child has reached 16 years of age, is living independently or is in further education, is a member of the armed forces, is in hospital or in custody in the secure estate, does not change their status or entitlements to services or protection.

Early Years Foundation Stage Framework

Children learn best when they are healthy, safe, secure, when their individual needs are met, and when they have positive relationships with the people caring for them. Trust schools all have Early Years settings and understand they must adhere to the Early Years Foundation Stage Framework, which makes specific reference to the following:

- Staff: child ratios - Suitable students on long term placements and volunteers (aged 17 or over) and staff working as apprentices in early education (aged 16 or over) may be included in the ratios at the level below their level of study, if the provider is satisfied that they are competent and responsible and if they hold a valid and current PFA qualification.
- Food and drink facilities – Schools must obtain allergy information. Whilst children are eating there should always be a member of staff in the room with a valid paediatric first aid certificate. Children must always be within sight and hearing of a member of staff whilst eating. When a child experiences a choking incident that requires intervention, providers should record details of where and how the child choked and parents and/or carers made aware.
- Toilet and intimate hygiene – adequate facilities and resources must be available as described in the individual school Intimate Care Policy.
- Safeguarding training Annex C – early years practitioners must be trained in line with the criteria set out in Annex C. This must be renewed every 2 years.
- All staff who obtained a level 2 and/or level 3 qualification since 30 June 2016 must obtain a PFA qualification within three months of starting work in order to be included in the required staff: child ratios at level 2 or level 3 in an early years setting. To continue to be included in the ratio requirement the certificate must be renewed every 3 years.

Key Information - Roles and Responsibilities

The Trust board and governing bodies have a strategic leadership responsibility for their school's safeguarding arrangements, as such, they must ensure that the policies and procedures are understood and followed by staff, and schools comply with their duties under legislation.

Roles and responsibilities for key stakeholders can be found in [appendix 1](#) and in the accompanying individual school suite of policies.

The Chief Executive Officer is:	<u>Jane Spence</u>
Contact details:	<u>01642 777963</u> <u>Jane@galileotrust.co.uk</u>
The Trust Nominated Safeguarding Trustee is:	<u>John Hind</u>
Contact details:	john.hind@galileotrust.co.uk

Local Safeguarding Contact Numbers

Role	Name	Contact
Headteacher	Helen Ede	office@lakesprimary.co.uk 01642 485894
Designated Safeguarding Lead (DSL)	Helen Ede	office@lakesprimary.co.uk 01642 485894
Deputy Designated Safeguarding Lead (DDSL)	Sarah Jordan	office@lakesprimary.co.uk 01642 485894
Mental Health Lead	Ruth Arnott	office@lakesprimary.co.uk 01642 485894
SENCO	Lisa Handley	office@lakesprimary.co.uk 01642 485894
Senior member of Staff responsible for LAC/PLAC	Helen Ede	office@lakesprimary.co.uk 01642 485894
Headteacher of Virtual School for our Local Authority	Pauline Douglas	pauline.douglas@redcar-cleveland.gov.uk
Chair of Governors	Mark Fletcher	Mark.Fletcher@galileotrust.co.uk

Governor for Safeguarding	Debs Fenny	office@lakesprimary.co.uk 01642 485894
Local Safeguarding Children Services	MACH	01642 130700
Local Authority Designated Officer (LADO) for allegations against professionals	Joanne Dickson	RedcarLADO@redcar-cleveland.gov.uk

Email contact for Safeguarding concerns is:

office@lakesprimary.co.uk – address concerns FAO the DSL

Email contact for Safeguarding at Galileo Multi Academy Trust is:

Info@galileotrust.co.uk – address concerns FAO: Jane Spence

NSPCC Helpline:0808 800 5000 help@NSPCC.org.uk

Where a child is suffering, or is likely to suffer from harm, it is important that a referral to local authority children’s social care (and if appropriate the police) is made immediately.

Creating an effective approach to safeguarding

Recognising abuse

To ensure that our pupils are protected from harm, we need to be aware of the indicators of abuse, neglect and exploitation.

Knowing what to look for is vital for early identification of abuse or neglect. All staff must follow the procedures set out below and be aware of indicators of abuse and neglect, including exploitation, so that they are able to identify cases of children who may need help or protection. This includes understanding specific safeguarding issues such as child criminal exploitation and child sexual exploitation. Staff should be aware that abuse, neglect, and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap with one another, therefore staff should be vigilant and if they are unsure, they should always speak to the designated safeguarding lead or deputy.

All staff are aware of the four main **categories of abuse**, which are:



However, abuse, neglect, exploitation and safeguarding issues are rarely standalone events and cannot be covered by one definition or label alone. In most cases, multiple issues will overlap with one another.

More in-depth definitions can be found in [appendix 2](#) of this policy and the Keeping Children Safe in Education statutory guidance.

Staff are also made aware of the other key safeguarding topics:

More in-depth definitions can be found in [appendix 3](#)

Child Criminal Exploitation (CCE)	Child Criminal & Sexual Exploitation (CCE & CSE)	Child on Child Abuse	Children who are absent from Education
Children who are Lesbian, Gay, Bi or Trans (LGBT)	Children with SEND or Health Issues	Consensual & Nonconsensual sharing of nude/semi-nude	Domestic Abuse
Early Help	Elective Home Education (EHE)	Forced/Child Marriage	Homelessness
Honour-based Abuse & Female Genital Mutation	Looked After & Previously Looked After Children	Mental Health & Impact of Abuse	Preventing Radicalisation & Channel
Private Fostering	Pupils who need a Social Worker (Child in Need & CP Plans)	Serious Violence	Sexual Violence/Sexual Harassment & HSB

What staff need to know and do

All staff are aware of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking, alcohol abuse, deliberately missing education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nudes and semi-nudes (also known as youth produced sexual imagery) put children in danger.

All those working in our schools understand their local authority's child protection reporting procedures which are consistent with [Working Together to Safeguard Children](#) and What to do if you're worried a child is being abused. Annex B of Keeping Children Safe in Education also includes information on further issues all staff should be aware of, including child abduction, exploitation and community safety incidents, children's involvement in the court system, children with family members in prison and cybercrime.

It is **not** the responsibility of the staff to investigate welfare concerns or determine the truth of any disclosure or allegation. All those working directly with children, however, have a duty to recognise concerns and maintain an open mind. Accordingly, all concerns regarding the welfare of pupils must be immediately reported and recorded following the school's child protection procedures and discussed with the DSL, prior to any discussion with parents.

Staff must immediately report to the DSL:

- any suspicion that a child is injured, marked, or bruised in a way which is not readily attributable to the normal knocks or scrapes received in play
- any explanation given which appears inconsistent or suspicious
- any behaviours which give rise to suspicions that a child may have suffered harm (e.g., worrying drawings or play)
- any concerns that a child may be suffering from inadequate care, ill treatment, or emotional maltreatment
- any concerns that a child is presenting signs or symptoms of abuse or neglect
- any significant changes in a child's presentation, unexplainable and/or persistent absences from education
- any hint or disclosure of abuse from any person
- any concerns regarding a person(s) who may pose a risk to children (e.g., living in a household with children present)

Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as part of a jigsaw, and each small piece of information will help the DSL to decide how to proceed.

It is very important that staff report their concerns – they do not need 'absolute proof' that the child is at risk.

If you are concerned about a pupil's welfare

There will be occasions when staff may suspect that a pupil may be at risk but have no 'real' evidence. The pupil's behaviour may have changed, their artwork could be bizarre, they may write stories or poetry that reveal confusion or distress, or physical but inconclusive signs may have been noticed. In these circumstances, staff will try to give the pupil the opportunity to talk. The signs they have noticed may be due to a variety of factors, for example, a parent has moved out, a pet has died, a grandparent is very ill. It is fine to ask the pupil if they are ok or if they can help in any way.

All concerns should be reported on the school's child protection reporting system or complete a cause for concern form. If the pupil does begin to reveal that they are being harmed, staff should follow the advice below. Following an initial conversation with the pupil, if the member of staff remains concerned, they should immediately discuss their concerns with the DSL.

If a pupil discloses to you

It takes a lot of courage for a child to disclose that they are being abused. They may feel ashamed, particularly if the abuse is sexual; their abuser may have threatened what will happen if they tell; they may have lost all trust in adults; or they may believe, or have been told, that the abuse is their own fault.

If a pupil talks to a member of staff about any risks to their safety or wellbeing, the staff member must let the pupil know they cannot keep the information secret but will keep it private and only pass it on to those who can help them. The point at which they tell the pupil this is a matter for professional judgement. If they jump in immediately the pupil may think that they do not want to listen, if left until the very end of the conversation, the pupil may feel that they have been misled into revealing more than they would have otherwise.

During their conversations with the pupils' staff will:

- allow them to speak freely
- listen to and take seriously any disclosure or information that a child may be at risk of harm
- remain calm and not overreact – the pupil may stop talking if they feel they are upsetting their listener
- give reassuring nods or words of comfort – 'I'm so sorry this has happened', 'I want to help', 'This isn't your fault', 'You are doing the right thing in talking to me'

- try to keep questions to a minimum and of an 'open' nature e.g. 'Can you tell me what happened?' rather than 'Did x hit you?'
- not be afraid of silences – remember how hard this must be for the pupil
- under no circumstances ask investigative questions – such as how many times this has happened, whether it happens to siblings too, or what does the pupil's mother think about all this
- clarify the information
- at an appropriate time tell the pupil that in order to help them, the member of staff or volunteer must pass the information on
- not automatically offer any physical touch as comfort. It may be anything but comforting to a child who has been abused
- try not to show signs of shock, horror, or surprise
- not express feelings or judgements regarding any lead alleged to have harmed the child
- explain sensitively to the person that they have a responsibility to refer the information to the DSL
- reassure and support the person as far as possible
- explain that only those who 'need to know' will be told
- explain what will happen next and that the person will be involved as appropriate
- avoid admonishing the child for not disclosing earlier. Saying things such as 'I do wish you had told me about this when it started' or 'I can't believe what I'm hearing' may be the staff member's way of being supportive but may be interpreted by the child to mean that they have done something wrong
- tell the pupil what will happen next. The pupil may agree to go to see the DSL, otherwise let them know that someone will come to see them before the end of the day
- reassure the child that they are being taken seriously and that they will be supported and kept safe
- report verbally to the DSL even if the child has promised to do it by themselves
- write up their conversation immediately on the school's child protection reporting system or cause for concern form and speak with the DSL to make sure they have received it
- if appropriate, make a referral to children's social care and/or the police directly and tell the DSL as soon as possible that you have done so
- do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process
- seek support if they feel distressed

Staff should understand they:

- should not investigate but will, wherever possible, elicit enough information to pass on to the DSL in order that they can make an informed decision of what to do next
- will not discuss the issue with colleagues, friends or family
- must record details following the school's child protection reporting procedures
- in an emergency take the necessary action to help the child e.g., refer to the police or children's social care
- maintain an attitude of '**it could happen here**'

Further support and guidance can be found:

NSPCC Child Protection Helpline

The NSPCC Child Protection Helpline is a free 24-hour service that provides counselling, information and advice to anyone concerned about a child at risk of abuse.

Telephone: 0808 800 5000 - Email: help@nspcc.org.uk

What the DSL will do

Following any information raising concern, the DSL will consider:

- any urgent medical needs of the child
- making an enquiry to find out if the child is subject to a Child Protection Plan by ringing the local safeguarding partners

- discussing the matter with other multi-agencies involved with the family
- consulting with appropriate persons e.g., children's social care or police
- the child's wishes

Then decide:

- wherever possible, to talk to parents, unless to do so may place a child at risk of significant harm, impede any police investigation and/or place the member of staff or others at risk
- whether to make a child protection referral to children's social care because a child is suffering or is likely to suffer significant harm and if this needs to be undertaken immediately

OR

- not to make a referral at this stage, recording their reasons and decision why not to do so
- if further monitoring is necessary
- if it would be appropriate to undertake an assessment by referring to early help

An early help approach incorporates early help to child protection cases, looked after children and those with special needs by providing support as soon as a concern emerges, placing the child at the heart of the process and building a safety network around their care.

All information and actions taken, including the reasons for any decisions made, must be fully documented.

All referrals to children's social care must be followed up in writing within 24 hours following the local safeguarding partners procedures.

Recording and Monitoring

Accurate records must be made immediately and will clearly distinguish between observation, fact, opinion, and hypothesis. Any information given will be recorded verbatim where possible and a note made of the location and description of any injuries seen.

Concerns should ideally be recorded on the school's child protection recording system, if recorded on a cause for concern form, they must be signed and dated.

All manual cause for concern forms and/or child protection documents will be retained in a 'Child Protection' file, separate from the pupil's main file. This will be locked away and only accessible to the safeguarding team. These records will be transferred to any forwarding school or setting the child moves to, clearly marked 'Child Protection, Confidential, for attention of DSL'. If the child goes missing from education or is removed from roll to be educated at home, then any child protection file will be sent to the local authority.

Helping Children to Keep Themselves Safe

We will ensure our children are taught about how to keep themselves and others safe, including online. Effective education will be tailored to the specific needs and vulnerabilities of individual children, including children who are victims of abuse and children with special educational needs or disabilities (SEND).

We will teach children to understand and manage risk through relevant topic which will include Relationships Education (for all primary pupils), and Relationships and Sex Education (for all secondary pupils) and Health Education (for all primary and secondary pupils). In teaching these subjects we will have regard to the [Relationships and sex education \(RSE\) and health education](#) statutory guidance.

We understand that our schools play a crucial role in preventative education. Preventative education is most effective in the context of a whole-school approach that prepares pupils and students for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic and sexual

violence/harassment. Each of our schools will have a clear set of values and standards, upheld, and demonstrated throughout all aspects of school life. These will be underpinned by the school's behaviour policy and pastoral support system, as well as by a planned programme of evidence based RSHE delivered in regularly timetabled lessons and reinforced throughout the whole curriculum. Such a programme will be inclusive and developed to be age and stage of development appropriate (especially when considering the needs of children with SEND and disabilities and other vulnerabilities). This programme will tackle at an age-appropriate stages issues such as:

- supporting children to develop the skills that form the building blocks of all positive relationships
- healthy and respectful relationships
- boundaries, consent and kindness in relationships
- stereotyping, prejudice and equality
- body confidence and self-esteem
- how to recognise and report concerns about an abusive relationship, including coercive and controlling behaviour
- the concepts of, and laws relating to, all forms of sexual harassment, and abuse, and how to access support, and
- what constitutes sexual harassment and sexual violence and why these are always unacceptable, emphasising that it is never the fault of the person experiencing it

Safeguarding Information for Pupils

All pupils in our schools are aware of several trusted adults who they can talk to. Our schools are committed to ensuring that pupils are aware of behaviour towards them that is not acceptable and how they can keep themselves safe. All pupils know that we have a senior member of staff (DSL) with responsibility for child protection and know who this is. We inform pupils who are trusted adults and whom they might talk to, both in and out of school, their right to be listened to and heard and what steps can be taken to protect them from harm.

Online Safety

The Trust do all they reasonably can to limit our pupils' exposure to risks online from the school's IT system.

We take a whole school approach including considering the age range of our pupils, the number of pupils, how often they access the IT system and the proportionality of cost vs risks.

Our pupils increasingly use mobile phones, tablets, and computers on a daily basis. They are a source of fun, entertainment, communication, and education. However, we know that some adults and young people will use these technologies to harm children. The harm might range from sending hurtful or abusive texts and emails, to enticing children to engage in sexually harmful conversations, webcam photography or face-to-face meetings. Each school's Online Safety Policy is based on addressing the high-risk categories of the 4C's listed on the next page as well as the use of mobile phones, cameras and other electronic devices with imaging and sharing capabilities are used in the setting, which reflects the fact that many children have unlimited and unrestricted access to internet via mobile phone networks (i.e. 3G, 4G and 5G).

School policies set out clear guidelines for the use of smart devices for the whole school community, establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, and where appropriate have regard to [Teaching Online Safety guidance](#), and [Meeting Digital and Technology Standards in Schools and Colleges](#).

Pupils using mobile devices in school

Pupils may only bring mobile devices into school with prior agreement of the Headteacher. Mobile devices must never be used during lessons and are usually left with the school office.

Any use of mobile devices in school by pupils must be in line with the acceptable use agreement (see Online Safety Policy).

Any breach of the acceptable use agreement by a pupil may trigger disciplinary action in line with the school behaviour policy, which may result in the confiscation of their device.

They explain how we try to keep pupils safe in school. Cyberbullying, sharing nudes and semi-nudes by pupils, via text, emails or other media platforms, will be treated as seriously as any other type of bullying and will be managed through our anti-bullying procedures and by following [UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people](#).

We believe an effective whole school approach to online safety empowers a school to protect and educate pupils, students, and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate.

The 4 Cs

The breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into four areas of risk:

Content: being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.

Contact: being subjected to harmful online interaction with other users; for example: peer to peer 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: online behaviour that increases the likelihood of, or causes, harm; for example, 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).

Commerce - risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group <https://apwg.org/>

Galileo Multi-academy Trust ensures that all schools have Securly installed. This is an appropriate filtering and monitoring system which is regularly reviewed for effectiveness. All Trust schools use systems which are aligned with the [DFE Filtering and Monitoring Standards](#), has regard to the Department's [Plan technology for your school service](#), to self-assess against the filtering and monitoring standards and the [Generative AI: product safety expectations](#) which supports the use of generative artificial intelligence safely, and explains how filtering and monitoring requirements apply to the use of generative AI in education. Monitoring reports are regularly reviewed by IT and safeguarding leaders.

Our Trust approach has four aspects:

Education – School's preventative curriculums help pupils understand how to stay safe online and why certain content is unacceptable.

Prevention – All staff are vigilant and don't rely on technical monitoring. Staff should provide effective supervision, maintain awareness of how devices are being used by pupils and report any safeguarding concerns to the DSL.

Reaction – All staff should address unacceptable and unsafe behaviour and the DSL should investigate any online safeguarding incidents.

Reporting and monitoring – Leaders should review monitoring reports, incidents reported to CPOMS and any other incidents involving technology so that strategies are put in place to ensure safe use of technology in our schools.

All staff need to be aware of reporting mechanisms for safeguarding and technical concerns. They should report if:

- they witness or suspect unsuitable material has been accessed
- they can access unsuitable material
- they are teaching topics which could create unusual activity on the filtering logs
- there is failure in the software or abuse of the system
- there are perceived unreasonable restrictions that affect teaching and learning or administrative tasks
- they notice abbreviations or misspellings that allow access to restricted material

Use of GPS Tracking Devices

For safeguarding and privacy reasons, personal GPS tracking devices — including AirTags and similar technology - must not be placed in children's bags or clothing without prior agreement from the Designated Safeguarding Lead (DSL).

These devices can raise significant concerns around privacy, welfare, and consent, particularly if used without the child's knowledge. If a device is found, it will be reviewed by the school and the matter discussed with parents or carers. Where necessary, the school may seek further advice, which could include escalation to the local authority, police, or the Information Commissioner's Office (ICO), especially where there are concerns about risk, coercive control, or unlawful data processing.

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 Gemini.

Galileo Multi Academy Trust 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.

Our schools will treat any use of AI to access harmful content or bully pupils in line with the individual school's Behaviour Policy.

Staff should be aware of the risks of using AI tools while they are still being developed and should carry out risk assessments for any new AI tool being used by the school. Our schools' requirements for filtering and monitoring also apply to the use of AI, in line with Keeping Children Safe in Education.

Cyber security

The Trust ensures that there is the appropriate level of security protection procedures in place to safeguard our systems, staff and learners and reviews the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies and to meet the Cyber security standards for schools.

Users are expected to:

1. Review the privacy settings for your social media, professional networking site and app accounts
2. Know who to report any unusual activity to. If you're not sure, ask your line manager or IT team
3. Check your device is set to receive updates automatically
4. Remove any apps that have not been downloaded from official stores
5. Set a strong password and switch on two-factor authentication, if available
6. Check that the password for your work account is unique.
7. If it's not possible to follow security advice, process or policy - flag it to the IT team

Statutory Assessments (link to [appendix 4](#) - Actions where there are concerns about a child)

Staff should follow the reporting procedures outlined in this policy. However, they may also share information directly with children's social care, police, or the NSPCC if:

- the situation is an emergency and the DSL, their deputy, the headteacher or the chair of governors are all unavailable
- they are convinced that a direct report is the only way to ensure the pupil's safety
- for any other reason they make a judgement that direct referral is in the best interests of the child

Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children's social care (and if appropriate the police) is made immediately. Referrals should follow the local referral process.

Children in need (section 17)

A child in need is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989.

Children suffering or likely to suffer significant harm (section 47)

Local authorities, with the help of other organisations as appropriate, have a duty to make enquires under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. Such enquiries enable them to decide whether they should take any action to safeguard and promote the child's welfare and must be initiated where there are concerns about maltreatment, including all forms of abuse and neglect, female genital mutilation or other so-called honour-based violence, and extra-familial threats like radicalisation and exploitation.

Support for those Involved in a Child Protection Issue

Child abuse is devastating for the child and can also result in distress and anxiety for staff who become involved. We will support pupils, their families, and staff by:

- taking all suspicions and disclosures seriously
- nominating the DSL as a link person who will keep all parties informed and be the central point of contact
- where a member of staff is the subject of an allegation made by a pupil, a separate link person will be nominated to avoid any conflict of interest
- responding sympathetically to any request from pupils or staff for time out to deal with distress or anxiety
- maintaining confidentiality and sharing information on a need-to-know basis only with relevant individuals and agencies
- storing records securely
- offering details of helplines, counselling, or other avenues of external support
- following the procedures laid down in our whistleblowing, complaints, and disciplinary procedures
- cooperating fully with relevant statutory agencies.

Supporting the Child and Partnership with Parents

We recognise that the child's welfare is paramount, however good child protection practice and outcome

relies on a positive, open, and honest working partnership with parents. Whilst we may, on occasion, need to make referrals without consultation with parents, we will make every effort to maintain a positive working relationship with them whilst fulfilling our duties to protect any child.

We will provide a secure, caring, supportive and protective relationship for the child and they will be given a proper explanation (appropriate to age & understanding) of what action is being taken on their behalf and why. We will endeavour always to preserve the privacy, dignity and right to confidentiality of the child and parents. The DSL will determine which members of staff “need to know” personal information and what they “need to know” for the purpose of supporting and protecting the child.

Photography and Images

We understand that parents like to take photos of, or video record their children in the school play, or at sports day, or school presentations. This is a normal part of family life, and we will not discourage parents from celebrating their child’s successes.

However, if there are health and safety issues associated with this - i.e. the use of a flash when taking photos could distract or dazzle the child, and cause them to have an accident, we will encourage parents to use film or settings on their camera that do not require flash. We will not allow others to photograph or film pupils during a school activity without the parent’s permission.

We will not allow images of pupils to be used on school websites, publicity, or press releases, without express permission from the parent, and if we do obtain such permission, we will not identify individual children by name. Permission from parents will be sought as children enter each key stage.

The school cannot however be held accountable for photographs or video footage taken by parents or members of the public at school functions.

Members of staff may use school equipment to take photographs of children whilst engaged in school activities for teaching and learning purposes; for assessment purposes or as means of celebrating successes in school.

Supporting Pupils with Medical Conditions

All schools adhere to [Section 100 of the Children and Families’ Act 2014](#) which places a duty to make arrangements to support pupils in school with medical conditions to have the same right of admission as other students and to ensure, in terms of both physical and mental health, they are properly supported in school so that they can play a full and active role in school life, remain healthy and achieve their academic potential. See schools Supporting Pupils with Medical Conditions Policy.

Use of Reasonable Force

There are circumstances when it is appropriate for staff in schools to use reasonable force to safeguard children and young people. The term ‘reasonable force’ covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury. ‘Reasonable’ in these circumstances means ‘using no more force than is needed’. The use of force may involve either passive physical contact, such as standing between pupils or blocking a pupil’s path, or active physical contact such as leading a pupil by the arm out of the classroom. Schools will follow departmental advice [Use of reasonable force in schools](#). The decision on whether to use ‘reasonable force’ to control or restrain a child should be down to the professional judgement of the staff concerned within the context of the law and should always depend on individual circumstances.

When using reasonable force in response to risks presented by incidents involving children with SEND, mental health problems or with medical conditions, we will consider the risks carefully fully recognising the additional vulnerability of these groups, duties under the Equality Act 2010 in relation to making reasonable adjustments, non-discrimination, the HM Government guidance [Reducing the need for restraint and restrictive intervention](#) and their Public Sector Equality Duty. We act proactively with behaviour support for more vulnerable children, agreeing plans with parents and carers to aid and reduce the occurrence of challenging behaviour and the need to use reasonable force.

Visitors

Visitors to our schools, including contractors, are asked to sign in and are given a badge, which confirms they have permission to be on site. Parents who are simply delivering or collecting their children do not need to sign in. All visitors are expected to observe the school's safeguarding and health and safety regulations to ensure children in school are kept safe. The headteacher will exercise professional judgement in determining whether any visitor should be escorted or supervised while on site.

Visitors to a school who are visiting in a professional capacity, such as educational psychologists and school improvement officers, will be asked to show photo ID and we will assure that the visitor has had the appropriate DBS check (or the visitor's employers have confirmed that their staff have appropriate checks). We will not ask to see the certificate in these circumstances.

All other visitors, including visiting speakers, will be always accompanied by a member of staff. Schools will not invite any speaker into school 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.

Volunteers

All schools understand that some people, otherwise unsuitable for working with children, may use volunteering to gain access to children. For this reason, any volunteers in the school, in whatever capacity, will be given the same recruitment consideration as paid staff, including a risk assessment, which will be recorded, as indicated in the latest version of Keeping Children Safe in Education.

Where a parent or other volunteer helps on a one-off basis, they will only work under the direct supervision of a member of staff, and at no time have unsupervised contact with children. However, if a parent or other volunteer is to be in school regularly or over a longer period, they will undergo checks commensurate with their work in the school and contact with pupils. The outcomes of the checks carried out.

Good Practice Guidelines and Staff Code of Conduct

To meet and maintain our responsibilities towards pupils we need to agree standards of good practice which form a code of conduct for all staff.

Good practice includes:

- treating all pupils with respect
- setting a good example by conducting ourselves professionally and appropriately
- taking responsibility for our own actions and behaviours and avoiding any conduct which would lead any reasonable person to question our motivation and intentions.
- encouraging staff to self-refer where they have found themselves in a situation which could have been misinterpreted, might appear compromising to others and/or reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.
- involving pupils in decisions that affect them.

- encouraging positive, respectful, and safe behaviour among pupils.
- being a good listener.
- being alert to changes in pupils' behaviour and to signs of abuse and neglect.
- recognising that challenging behaviour may be an indicator of abuse.
- reading and understanding the school's safeguarding suite of policies and guidance documents on wider safeguarding issues, for example bullying, behaviour, physical contact, and information-sharing
- asking the pupil's permission before initiating physical contact, such as assisting with dressing, physical support during PE or administering first aid.
- maintaining appropriate standards of conversation and interaction with and between pupils and avoiding the use of sexualised or derogatory language.
- being aware that the personal and family circumstances and lifestyles of some pupils lead to an increased risk of abuse.
- applying the use of reasonable force only as a last resort and in compliance with school and local authority procedures.
- not give corporal punishment, threaten corporal punishment or any punishment which could adversely affect a child's well-being.
- referring all concerns about a pupil's safety and welfare to the DSL, or, if necessarily make a direct referral to police or local authority.
- adhering to the school's policies regarding the use of personal mobile and image sharing devices, communication with pupils, use of social media and online networking.
- acknowledge our responsibility to inform the headteacher of any change of name or in our personal circumstances which may affect our ability to work with children as soon as reasonably practicable.
- acknowledge our responsibility to declare to the headteacher immediately of anything that affects our qualification to work with children.
- work in an open and transparent way.
- work with other colleagues where possible, avoiding any situations which may leave it open to question.
- discuss and/or take advice from school management over any incident which may give rise to concern.
- immediately record any incidents, concerns, actions, and decisions made.
- apply the same professional standards regardless of sex, race, disability, religion or belief or sexual orientation, have equal rights to protection.
- be aware of the schools Confidentiality Policy.
- be aware that breaches of the law and other professional guidelines could result in criminal and/or disciplinary action being taken against them.

Research and serious case reviews have repeatedly shown the dangers of failing to take effective action. Our schools are aware that examples of poor practice may include:

- failing to act on and refer early signs of abuse and neglect.
- poor record keeping.
- failing to listen to the views of the child.
- failing to reassess concerns when situations do not improve.
- not sharing information with the right people within and between agencies.
- sharing information too slowly.
- a lack of challenge to those who appear not to be taking action.

Safeguarding Concerns or Allegations Against Professional Who Work with Children

Each of our schools should have their own procedures for dealing with low-level concerns and/or allegations against those working in or on behalf of their school in a paid or unpaid capacity.

Our schools follow the procedures as laid out in Part four, Keeping Children Safe in Education which has two sections covering the two levels of allegations/concerns and are consistent with local safeguarding

procedures and practice guidance ([appendix 6](#) – Responding to allegations or low-level concerns flowchart).

What staff need to know and do

An allegation is any information which indicates any adult who works with children and young people under 18 (paid or voluntary staff), including individuals using the school's premises for the purposes of running activities for children, which may have:

1. Behaved in a way that has harmed a child, or may have harmed a child;
 2. Possibly committed a criminal offence against or related to a child;
 3. Behaved towards a child or children in such a way that indicates he or she may pose a risk of harm to children; or
 4. Behaved or may have behaved in a way that indicates they may not be suitable to work with children.
- Allegations regarding adults in the school must be reported immediately to the headteacher, or in their absence the deputy headteacher.
 - If you feel you may be at risk of an allegation then self-report the issue as you may find yourself in a difficult situation.
 - Any allegations concerning the headteacher should be referred to the school's Chair of Governors or Trust using the contacts details set out in this or the individual schools policies.
 - Concerns that meet the above criteria will be referred to the Local Authority Designated Officer (LADO) within one working day.
 - Initial discussions with the LADO will consider the nature of the allegation and next steps.
 - Whilst the school does not directly employ supply staff, we will ensure allegations are dealt with properly. In no circumstances will our setting decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the local authority designated officer (LADO) to determine a suitable outcome. The Governing Body will discuss with the agency as to whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, whilst they carry out their investigation.
 - The school will usually take the lead because agencies do not have direct access to children or other school staff, so they will not be able to collect the facts when an allegation is made, nor do they have all the relevant information required by the LADO as part of the referral process.
 - The Managing Allegation and Low-level Concerns Policy sets out the procedures in place to make a referral to the Disclosure and Barring Service (DBS) if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned. Or where a teacher's employer, including an agency, dismisses or ceases to use the services of a teacher because of serious misconduct, or might have dismissed them or ceased to use their services had they not left first, they must consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency).
 - There is a legal requirement for schools and colleges to make a referral to the DBS where they remove an individual from regulated activity (or would have removed an individual had they not left), and they believe the individual has:
 - engaged in relevant conduct in relation to children and/or adults,
 - satisfied the harm test in relation to children and/or vulnerable adults; or
 - been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence.

The DBS will consider whether to bar the person.

- Where a school employer, including an agency, dismisses or ceases to use the services of a teacher because of serious misconduct, or might have dismissed them or ceased to use their services had they not left first, they must consider whether to refer the case to the Secretary of State, as required by sections 141D and 141E of the Education Act 2002. The Secretary of State may investigate the case, and if s/he finds there is a case to answer, must then decide whether to

make a prohibition order in respect of the person.

Concerns that do not meet the Harm Threshold

Our schools recognise the importance of responding to and dealing with any concerns in a timely manner, about all adults, working in or on behalf of the school (including supply teachers, volunteers, contractors and individuals using school premises for the purposes of running activities for children), are dealt with promptly and appropriately to safeguard the welfare of children. We aim to create a culture in which all concerns about adults (including allegations that do not meet the harms threshold) are shared responsibly and with the right person, recorded and dealt with appropriately. If we implement this correctly, this should encourage an open and transparent culture; enable our schools to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of the school are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution.

Definition of low-level concerns

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

- is inconsistent with the Staff Code of Conduct/Staff Handbook/Letting Agreement, including inappropriate conduct outside of work
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO

Examples of such behaviour could include, but are not limited to:

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

Whistleblowing

Galileo Multi Academy Trust understands that employees are often the first to realise that there may be something seriously wrong within the school. However, they may not express their concerns because they feel that speaking up would be disloyal to their colleagues or to the school. They may also fear harassment or victimisation. In these circumstances it may be easier to ignore the concern rather than report what may just be a suspicion of malpractice.

The Trust is committed to the highest possible standards of openness, probity, and accountability. In line with that commitment and to reflect the principles in [Sir Robert Francis' Freedom to Speak Up Review](#), we expect employees, and others who work on behalf of the Trust, who have serious concerns about any aspect of schoolwork to come forward and voice those concerns. It is recognised that most cases will have to proceed on a confidential basis, more details and organisations which may be contacted can be found in the Trust' Whistleblowing Policy.

Further support and guidance can be found:

NSPCC Whistleblowing Advice Line

The NSPCC has launched a government funded Whistleblowing Advice Line. This will take calls from professionals from any sector who are worried about the way their, or another, organisation is dealing with child protection issues. Employees who don't feel able to escalate these issues internally can contact the service, as well as those who have been unsuccessful in doing so.

- general advice on whistleblowing can be found via: [Advice on Whistleblowing](#)
- the NSPCC's [what you can do to report abuse](#) dedicated helpline is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by their school.
 - call 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday
 - email: help@nspcc.org.uk

Abuse of Trust – Staff and Pupil Relationships

All staff are aware that inappropriate behaviour towards pupils is unacceptable and that their conduct towards pupils must be beyond reproach.

In addition, staff should understand that, under the [Sexual Offences Act 2003](#), it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a member of the school staff and a pupil under 18 may be a criminal offence, even if that pupil is over the age of consent. The school's Code of Conduct sets out our expectations of staff and is provided to all staff members at induction.

Management of Safeguarding

Governors

Our governing bodies will have strategic leadership responsibility for their school's safeguarding arrangements and must ensure that they comply with their duties under legislation. They must have regard to Part 2, Keeping Children Safe in Education guidance, and the [Academy trust governance guide](#) ensuring policies, procedures and training in their schools are effective and comply with the law at all times.

In addition, the governing body will supply information as requested by the local safeguarding partnership (including ensuring completion of the section 175 Annual Review Monitoring) and the Local Authority Education Safeguarding Team.

Our governing bodies will have a senior board level (or equivalent) lead to take leadership responsibility for their school's safeguarding arrangements and will ensure that all governors and trustees receive appropriate safeguarding and child protection (including online safety and the expectations, applicable roles and responsibilities in relation to filtering and monitoring and cyber security) training at induction. This training will equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in school are effective and support the delivery of a robust whole school approach to safeguarding. Their training will be regularly updated.

Our governing bodies will read Keeping Children Safe in Education guidance in its entirety.

Equality Act, Public Sector Equality Duty (PSED) and Human Rights

Galileo Multi Academy Trust acknowledges its responsibilities towards equality. The three previous general and specific equality duties on schools (race, disability, and gender) to eliminate discrimination and advance equality of opportunity have been combined into a less bureaucratic and more outcome-focused duties covering an expanded number of protected characteristics referred to as [The Equality Act 2010](#).

The Act makes it unlawful for the responsible body of a school to discriminate against, harass or victimise a pupil or potential pupil:

- in relation to admissions

- in the way it provides education for pupils
- in the way it provides pupils access to any benefit, facility, or service
- by excluding a pupil or subjecting them to any other detriment

The Act introduced a single [Public Sector Equality Duty \(PSED\)](#) that applies to schools and extends to certain protected characteristics - race, disability, sex, age, religion or belief, sexual orientation, pregnancy and maternity and gender reassignment. More detailed information can be found in the schools Race Equality Policy.

Human Rights Act

The [Human Rights Act 1998](#) sets out the fundamental rights and freedoms that everyone in the UK is entitled to and contains the Articles and protocols of the European Convention on Human Rights (ECHR) (the Convention) that are deemed to apply in the UK. It compels public organisations to respect and protect an individual's human rights when they make individual decisions about them.

Under the HRA, it is unlawful for schools to act in a way that is incompatible with the Convention. The specific convention rights applying to schools are:

- Article 3: the right to freedom from inhuman and degrading treatment (an absolute right)
- Article 8: the right to respect for private and family life (a qualified right) includes a duty to protect individuals' physical and psychological integrity
- Article 14: requires that all the rights and freedoms set out in the Act must be protected and applied without discrimination
- Protocol 1, Article 2: protects the right to education

Being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach any or all these rights, depending on the nature of the conduct and the circumstances. Further information (including on absolute and qualified rights) can be found at Human Rights | Equality and Human Rights Commission (equalityhumanrights.com).

Complaints Procedure

Galileo Multi Academy Trust's complaint procedure will be followed where a pupil or parent raises a concern about poor practice towards a pupil that initially does not reach the threshold for child protection action. Poor practice examples include unfairly singling out a pupil or attempting to humiliate them, bullying, or belittling a pupil or discriminating against them in some way. Any complaint will be taken seriously procedures followed by a senior member of as detailed in our Complaints Policy.

Complaints from staff are dealt with under the school's grievance and/or disciplinary procedures. Complaints against staff that are likely to require a child protection investigation will be handled in accordance with the Trust's procedures for dealing with allegations of abuse made against staff.

Confidentiality and Sharing Information

All schools have regard to [HM Government advice: Information sharing advice for safeguarding practitioners 2024](#) and those working for and on behalf of the school, will ensure that all data about pupils is handled in accordance with this guidance.

Our schools have a clear and explicit Confidentiality Policy. The school policy indicates:

- when information must be shared with police and children's social care where the child is / may be at risk of significant harm
- when the pupil's and/or parent's confidentiality must not be breached

- that information is shared on a need-to-know basis

Any member of staff who has access to sensitive information about a child or the child's family must take all reasonable steps to ensure that such information is only disclosed on a 'need to know' basis.

Regardless of the duty of confidentiality, if any member of staff has reason to believe that a child may be suffering harm, or be at risk of harm, their duty is to forward this information without delay to the DSL.

Staff will only discuss concerns with the DSL, headteacher or chair of governors or Trust Board (depending on who is the subject of the concern). That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

Child protection information will be stored and handled in line with the data protection principles of the [UK General Data Protection Regulations](#), [Data Protection Act 2018](#) and [Freedom of Information Act 2000](#). In addition, see the [DfE Data Protection guidance for schools](#), which will help school staff, governors and trustees understand how to comply with data protection law, develop their data policies and processes, know what staff and pupil data to keep and follow good practices for preventing personal data breaches.

Information is:

1. Used fairly, lawfully, and transparently
2. Used for specified, explicit purposes
3. Used in a way that is adequate, relevant, and limited to only what is necessary
4. Accurate and, where necessary, kept up to date
5. Kept for no longer than is necessary
6. Handled in a way that ensures appropriate security, including protection against unlawful

or unauthorised processing, access, loss, destruction, or damage

Electronic information will be recorded on the school's child protection recording system and security protected and only made available to relevant individuals. Written paper documents and other written information will be stored in a separate file and locked facility. The pupil's school file will be 'tagged' to indicate that separate information is held.

Every effort will be made to prevent unauthorised access, and sensitive information should not be stored on laptop computers, which, by the nature of their portability, could be lost or stolen. If it is necessary to store child protection information on portable media, such as a laptop or a flash drive, these items must be encrypted and kept in locked storage.

Child protection records are normally exempt from the disclosure provisions of the Data Protection Act, which means that children and parents do not have an automatic right to see them. If any member of staff receives a request from a pupil or parent to see child protection records, they will refer the request to the headteacher or DSL.

The Data Protection Act does not prevent school staff from sharing information with relevant agencies, where that information may help to protect a child. The school's policy on confidentiality is available to staff, parents, and pupils. ([Appendix 5](#) - Information sharing flowchart).

Galileo Multi Academy Trust references [The Information Commissioner's Employment Practices Code](#) and [ICO guidance 'For Organisations'](#) which includes information about our obligations and how to comply, including protecting personal information, and providing access to official information.

Health and Safety

The health and safety of our pupils and staff is of utmost importance. Our schools carry out regular risk

assessments in accordance with guidance, has robust health and safety procedures and policies, including emergency evacuation, invacuation and lock-down. The Health and Safety Policy is regularly reviewed and monitored by Trustees and staff.

Information security and access management

Our schools understand they are directly responsible for ensuring they have the appropriate level of security protection procedures in place to safeguard their systems, staff and learners and review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies. We will follow the guidance on e-security from the [National Education Network](#) and consider meeting the [Cyber security standards for schools and colleges.GOV.UK](#).

All staff receive online safety awareness from induction and advice regarding the use of social networking and electronic communication with pupils.

Trust schools will:

- have robust processes in place to ensure the online safety of pupils, staff, volunteers, and governors
- protect and educate the whole school community in its safe and responsible use of technology, including the use of mobile phones, cameras and other electronic devices with imaging and sharing capabilities in accordance with [Statutory Framework for Early Years](#), where applicable
- establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

Whilst considering our responsibility to safeguard and promote the welfare of children and provide them with a safe environment in which to learn, we will be doing all that we reasonably can to limit children's exposure to the above risks from the school's system. As part of this process, school's governing bodies will ensure their school has appropriate filters and monitoring systems in place and regularly review their effectiveness

Pupil Information

Our schools will endeavour to keep information up to date and accurate to keep children safe and provide appropriate care for them the school requires accurate and up to date information regarding:

- names and contact details of persons with whom the child normally lives
- names and contact details of all persons with parental responsibility (if different from above)
- a minimum of two emergency contact details
- details of any persons authorised to collect the child from school (if different from above)
- any relevant court orders in place including those which affect any person's access to the child (e.g. Residence Order, Contact Order, Care Order, Injunctions etc.)
- if the child is or has been on the Child Protection Register or subject to a care plan
- name and contact detail of G.P.
- any other factors which may impact on the safety and welfare of the child

The school will securely and confidentially store and agree access to this information in line with [Data Protection Act 2018](#).

Children educated in alternative provision

Where a school places a child with an alternative provision provider, we will follow the [DfE Alternative provision](#) statutory guidance. Our schools understand they continue to be responsible for the safeguarding of that pupil and should be satisfied that the placement meets the pupil's needs.

Schools will ensure there are processes and procedures in place to ensure this group of children are appropriately safeguarded, including making appropriate, at least half-termly checks, on the provision registration status, keeping records of the address and any subcontracted provision or satellite sites which the child may attend of the alternative provider, as well as:

- Obtaining written confirmation from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at the establishment, i.e. those checks that the school would otherwise perform in respect of its own staff and that the provider have declared that they have safer recruitment practices in place and that the alternative provider will inform our schools of any arrangements that may put the child at risk (i.e. staff changes).
- Undertaking quality assurance of provision and curriculum of the provider
- Receiving daily attendance reporting from the provider and assurance that any unauthorised or unexplained absences are investigated and minimised

Where safeguarding concerns arise, the placement will be immediately reviewed, and terminated, if necessary, unless or until those concerns have been satisfactorily addressed.

Use of school premises for non-school activities

Where our schools hire or rent out school facilities/premises to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities) they will ensure that appropriate arrangements are in place to keep children safe.

When services or activities are provided under the direct supervision or management of the school staff, the schools arrangements for child protection will apply. However, where services or activities are provided separately by another body, the school will seek assurance that the provider concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place for the provider to liaise with the school on these matters where appropriate. This applies regardless of whether or not the children who attend any of these services or activities are children on the school roll. Schools will also ensure safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement.

We will follow guidelines in [Keeping children safe in out-of-school settings](#)

Safer Recruitment

Trust schools endeavour to ensure that they do their utmost to employ 'safe' staff by following their Recruitment and Selection Policy which has been written in accordance with the latest version of Keeping Children Safe in Education, Early Years Safeguarding Framework and their local safeguarding partner arrangements. The Trust will ensure schools adopt robust recruitment procedures that deter, reject and identify people who are unsuitable to work with children from applying for or securing employment, or volunteering opportunities in our schools.

Our schools have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children:

- Advertising: includes clear commitment to safeguarding and promoting the welfare of children.
- Shortlisting: involves at least 2 people, online searches, criminal record self-declarations and our statement on the employment of ex-offenders.
- Selection: includes a range of techniques to identify the most suitable person for the post.
- Pre-appointment vetting and criminal record checks: relevant to the post in accordance with Part 3, Keeping Children Safe in Education and [Disqualification under the Childcare Act](#).
- Trustees, governors and volunteers are appropriately checked and supervised when in school if they have not been DBS Enhanced and barred list checked.
- Supply staff and 3rd parties: we obtain written assurance from organisations that the staff they provide have been appropriately checked and are suitable to work with children. Trainee teachers will be

checked either by the school or by the training provider, from whom written confirmation will be obtained confirming their suitability to work with children.

- Alternative Provision: we obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform.
- Adults who supervise pupils on work experience: we ensure that policies and procedures are in place to protect children from harm.
- Pupils staying with host families: we request enhanced DBS checks with barred list information or work with partner schools abroad to ensure that similar assurances are undertaken prior to the visit.
- Each Trust school maintains a single central record of recruitment checks undertaken.

Retention of documents

Copies of documents used to verify the successful candidate's identity, right to work and required qualifications will be kept on their personnel file.

Copies of DBS certificates and records of criminal information disclosed by the candidate are covered by UK GDPR/DPA 2018 Article 10. Therefore, Trust schools will not retain copies of DBS certificates.

Staff and Governor Training

All new members of staff (including volunteers) will receive an induction and safeguarding and child protection awareness training, including online safety which includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring, which will give an overview of the organisation, ensure they know its purpose, values, services, structure and to enable them to recognise the possible signs of abuse and neglect and to know what to do if they have a concern.

All staff and volunteers will be expected to attend safeguarding updates regularly, at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.

New staff and volunteers will receive an explanation during their induction which includes the school's safeguarding policies, reporting and recording arrangements, the staff handbook, details for the DSL, the school's Behaviour Policy and at least Part one, Part five and Annex B of Keeping Children Safe in Education, What to do if you're worried a child is being abused and the Trust's Whistleblowing Policy.

Staff caring for 0–5-year-olds receive safeguarding training appropriate to the age of the children being cared for. The Early Years Leads and practitioners are trained in line with the criteria set out in Annex C of the Early Years Foundation Stage (EYFS). This training will be renewed every two years.

All staff are required to complete National Cyber Security Centre - NCSC.GOV.UK training from induction and annually, during the first week of September.

The DSL will receive appropriate training updated at least every two years. In addition to formal training their knowledge and skills will be updated at regular intervals, but at least annually, to keep up with any developments relevant to their role.

There will be a recruitment panel responsible for the safe recruitment of all those working directly with children. There will always be at least one member of each recruitment panel who will have attended safer recruitment training.

Our governing bodies will ensure that all governors and trustees receive appropriate safeguarding and child protection (including online) training at induction. This training will equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in schools are effective and support the delivery of a robust whole school approach to safeguarding. Their training should be regularly updated.

To ensure compliance under [Section 5B of the 2003 Act](#). All staff in teaching work will undertake FGM training to make them aware of the indicators and their responsibilities around the mandatory reporting FGM.

To ensure compliance under [section 26 of the Counter-Terrorism and Security Act 2015](#) at least the DSL and the Prevent governor undertake Prevent training in order to exercise of their functions, to have “due regard to the need to prevent people from being drawn into terrorism”.

Designated teachers for looked after children will undergo training appropriate to their subject responsibilities.

Whilst considering the above training requirements, governing bodies and proprietors should have regard to the Teachers’ Standards which set out the expectation that all teachers manage behaviour effectively to ensure a good and safe educational environment and requires teachers to have a clear understanding of the needs of all pupils.

Appendix 1 – Roles & Responsibilities

Roles & Responsibilities

Role of the Designated Safeguarding Lead

In accordance with Keeping Children Safe in Education, the governing body has appointed a senior leader as the Designated Safeguarding Lead (DSL) to take lead responsibility for safeguarding and child protection (including online safety) within school. In addition, all schools have Deputy Designated Safeguarding Leads (DDSL's), who have been trained to the same standard and as such safeguarding activities are delegated to them. However, the ultimate lead responsibility for child protection remains with the DSL.

Designated Safeguarding Lead main role:

The DSL is expected to:

- take **lead responsibility** for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place)
- activities can be delegated to deputy designated safeguarding leads, but the ultimate lead responsibility remains with the designated safeguarding lead and must not be delegated
- have the appropriate status and authority within the school to carry out the duties of the post
- given additional time, funding, training, resources and support they need to carry out the role effectively
- provide advice and support to other staff on child welfare, safeguarding and child protection matters
- take part in strategy discussions and inter-agency meetings, and/or to support other staff to do so, and to contribute to the assessment of children

Manage Referrals

- refer cases of suspected abuse and neglect to the local authority children's social care as required and support staff who make referrals to local authority children's social care
- refer cases to the Channel programme where there is a radicalisation concern as required and support staff who make referrals to the Channel programme
- refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
- refer cases where a crime may have been committed to the Police as required, following NPCC - When to call the police: guidance for schools and colleges (npcc.police.uk).

Work with Others

- act as a point of contact with the three safeguarding partners
- act as a source of support, advice, and expertise to staff
- liaise with the headteacher to inform him or her of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations This should include being aware of the requirement for children to have an Appropriate Adult as detailed in the Statutory guidance - PACE Code C 2019
- as required, liaise with the "case manager" (as per Part four) and the designated officer(s) at the local authority for child protection concerns in cases which concern a staff member
- liaise with staff (especially teachers, pastoral support staff, school nurses, IT Technicians, and SENCOs and Senior Mental Health Leads) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically
- liaise with the senior mental health lead and, where available, the Mental Health Support Team, where safeguarding concerns are linked to mental health;
- promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances;

- work with the headteacher and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement, and achievement at school. This includes:
- ensure that the school knows who its cohort of children who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort:
- support teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes.

Information sharing and managing the child protection file

- ensure that child protection files are kept up to date, separately from the pupils main file and the information is kept confidential and stored securely
- the file is only accessible by those who need to see it and when the contents are shared this happens in line with information sharing advice
- child protection records 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 children leave the school (including in year transfers) the child protection file is transferred to the new school as soon as possible and within 5 days for in-year transfer or within the first 5 days of the start of a new term. It will be:
 - transferred separately from the main pupil file
 - via secure transit
 - a confirmation of receipt obtained from the forwarding school
- receiving schools should ensure key staff such as designated safeguarding leads and SENCOs are aware as required.
- consider if it would be appropriate to share any additional information with the new school in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school

Training

The designated safeguarding lead (and any deputies) will undergo training to provide them with the knowledge and skills required to carry out the role. This training will be updated at least every two years. In addition, the designated safeguarding lead will undertake Prevent awareness training and Early Years Designated Safeguard Lead training in line with Annex C of EYFS. Training will provide designated safeguarding leads with a good understanding of their own role, and the processes, procedures, and responsibilities of other agencies, particularly children's social care, so they:

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so
- understand the importance of the role the designated safeguarding lead has in providing information and support to children social care to safeguard and promote the welfare of children
- understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health, and wellbeing, and what is needed in responding to this in promoting educational outcomes
- ensure each member of staff has access to, and understands, the school's safeguarding and child protection policy and procedures, especially new and part time staff

- are alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation
- understand the importance of information sharing, both within the school and with the three safeguarding partners, other agencies, organisations and practitioners
- understand and support the school with regards to the requirements of the Prevent duty and are able to provide advice and support to staff with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school
- can recognise the additional risks that children with special educational needs and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support children with SEND to stay safe online;
- obtain access to resources and attend any relevant or refresher training courses;
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school may put in place to protect them.

Raise Awareness

- ensure each member of staff has access to, and understands, the school's safeguarding and child protection policies, especially new and part time staff
- ensure the school's safeguarding and child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this
- ensure the safeguarding and child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school in this
- link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements; and,
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and school leadership staff.

Providing support to staff

Training will support the designated safeguarding lead in developing expertise, so they can support and advise staff and help them feel confident on welfare, safeguarding and child protection matters. This is included specifically to:

- ensure that staff are supported during the referrals processes; and
- support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.

Understand the view of children

It is important that children feel heard and understood. Therefore, designated safeguarding leads will be supported in developing knowledge and skills to:

- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the school may put in place to protect them
- understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.

Holding and sharing information

The critical importance of recording, holding, using, and sharing information effectively is set out in Parts one, two and five of Keeping Children Safe in Education and therefore the designated safeguarding lead should be equipped to:

- understand the importance of information sharing, both within the school and with other schools on transfer including in-year and between primary and secondary education, and with the safeguarding partners, other agencies, organisations and practitioners
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR)
- be able to keep detailed, accurate, secure written records of concerns and referrals and understand the purpose of this record-keeping.

Availability

During term time the designated safeguarding lead (or a deputy) will always be available (during school hours) for staff in the school to discuss any safeguarding concerns. Whilst generally speaking the designated safeguarding lead (or deputy) would be expected to be available in person, it is a matter for individual schools, working with the designated safeguarding lead, to define what “available” means and whether in exceptional circumstances availability via phone and or Skype or other such media is acceptable.

All schools will agree and arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.

Deputy Designated Safeguarding Leads

All deputies are trained to the same standard as the designated safeguarding leads, this is explicit in their job description.

The Trust

Galileo Multi Academy Trust trustees have a strategic leadership responsibility for the Trust’s safeguarding arrangements. The Trustees will safeguard and promote the welfare of children, have regard to statutory guidance, ensure the suitability of adults working in and with schools. They will receive appropriate training to provide them with the necessary knowledge to ensure safeguarding policies and procedures are effective.

Trustees delegate the monitoring of safeguarding in schools to the local Governing Boards. The Trust will ensure there are mechanisms in place across the Trust to assist staff in understanding and discharging their statutory safeguarding roles and responsibilities.

The Trustees will focus on the core functions as outlined in the Academy Trust Handbook. They will ensure clarity of vision, ethos and strategic direction. Holding executive leaders to account for the educational performance of the school, its pupils and the performance of staff, including overseeing and ensuring effective financial performance.

Governing bodies ensure each Trust school:

Appoint a Governor Safeguarding Lead, to monitor the effectiveness of this policy and procedures. The details of the Governor Safeguarding Lead will be available publically. Governors will ensure that there are mechanisms in place to assist school staff in understanding and discharging their statutory safeguarding roles and responsibilities. Governors will ensure that the school is working with local safeguarding partners and that the school contributes to multi-agency working, adhering to the latest version of Working Together to Safeguard Children. All those involved in governance will read the latest version of Keeping Children Safe in Education (KCSiE), in its entirety, and a record will be kept of this.

Governors will ensure schools adhere to their responsibilities as set out in Part 2 of KCSiE and comply to the law at all times.

As part of these responsibilities the governors will;

- have a senior board level lead to take leadership responsibility for safeguarding arrangements, ensure there is an explicit role-holder’s job description which describes the broad area of responsibilities and activities related to the role (see appendix 1)

- ensure all governors regularly receive appropriate safeguarding and child protection (including online and understanding the filtering and monitoring systems and processes in place) training
- be aware of their obligations under:
 - Human Rights Act 1998
 - Equality Act 2010 (including the Public Sector Equality Duty)
 - Data protection and UKGDPR
 - Local authority safeguarding arrangements
- understand that 'safeguarding of children and individuals at risk' is a processing condition that allows practitioners to share special category personal data. This includes allowing practitioners to share information without consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner. It would be legitimate to share information without consent where:
 - it is not possible to gain consent
 - it cannot be reasonably expected that a practitioner gains consent
 - if to gain consent would place a child at risk
 - not providing pupils' personal data where the serious harm test under the legislation is met
- fears about sharing information will not be allowed to stand in the way of the need to promote the welfare and protect the safety of children. Understand that information can be shared without consent if there is a good reason to
- ensure their Safeguarding and Child Protection policy is effective and developed in accordance with locally agreed multi-agency safeguarding arrangements put in place by the three safeguarding partners. This policy is updated annually (as a minimum) and available via the school's website
- each school policy reflects their individual approach to:
 - child-on-child abuse
 - reporting systems
 - online safety
 - SEND
- have an appropriate Staff Code of Conduct which is regularly reviewed and includes, amongst other things, low-level concerns, allegations against staff, whistleblowing, acceptable use of technologies (including use of mobile devices), staff/pupil relationships and communications including the use of social media
- Behaviour Policy, which includes measures to prevent bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- have appropriate safeguarding responses, which are understood by all staff, to children who go missing from education, particularly on repeated occasions and/or for prolonged periods, to help identify the risk of abuse and neglect, including sexual abuse or exploitation and to help prevent the risk of their going missing in future
- have a safeguarding training strategy where all staff undergo safeguarding and child protection training which includes meets the requirements under KCSiE
- recognises the expertise staff's experience and knowledge and encourages them to contribute to and shape safeguarding arrangements and safeguarding policies
- adhere to statutory responsibilities by having a written Recruitment and Selection Policy and procedures in place to prevent people who pose a risk of harm from working with children. Take proportionate decisions on whether to ask for any checks beyond what is required and ensuring all volunteers, undergo a risk assessment and if not fully checked, are appropriately supervised
- appoints a designated teacher to work with local authorities to promote the educational achievement of registered pupils who are looked after. The designated teacher has responsibilities under sections 4 to 6 of the Children and Social Work Act 2017 for promoting educational achievement of children who were adopted from state care outside England and Wales. They are appropriately trained and have the relevant qualification and experience
- maintains and regularly reviews their single central record for completeness and accuracy, which covers all staff (including supply staff, and teacher trainees on salaried routes) who work at the school
- consider how children may be taught about safeguarding, including online safety, through teaching

and learning opportunities, as part of providing a broad and balanced curriculum. This may include covering relevant issues through guidance under Relationships and Sex Education (RSE) and Personal, Social, Health and Economic education (PSHE) as laid out in KCSiE

- ensure chair of governors take responsibility for liaising with the local authority and other agencies in the event of an allegation being made against the headteacher.

The headteacher

Will be responsible for the implementation of this policy and will ensure:

- this policy is reviewed annually and ratified by the governing body
- all staff read at least Part one, Part five and Annex B of the latest version of KCSiE, this policy, the school's Code of Conduct, Behaviour and Online Safety Policy and What to do if you're worried a child is being abused and that there are mechanisms in place to assist staff to understand and discharge their role and responsibilities
- all child protection concerns, and disclosures are taken as an utmost priority, actioned immediately, recorded on the school's child protection recording systems and followed up by the DSL
- there is sufficient time, training, support, and resources, including cover arrangements, when necessary, to enable the DSL and deputy to carry out their roles effectively, including the assessment of pupils and attendance at strategy discussions and other necessary meetings
- all staff undergo an induction and are provided with the following, as a minimum:
 - the Safeguarding and Child Protection Policy
 - the Behaviour & Online Safety Policy
 - the Staff Code of Conduct
 - the school's safeguarding response to children who go missing from education
 - Part one & Part five of Keeping Children Safe in Education & Annex B
 - What to do if you are worried a child is being abused
 - Safeguarding and Child Protection Training inc. online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring
 - Other safeguarding policies/training relevant to their role
- all staff feel able to raise concerns about poor or unsafe practice in accordance with the whistleblowing procedures
- children are taught about safeguarding, including online safety, through teaching and learning opportunities, as part of providing a broad and balanced curriculum as laid out in KCSiE
- liaison with the Local Authority Designated Officer (LADO) where an allegation/concern is raised against a member of staff, supply teacher, contractor or organisation renting out school facilities/premises, before taking any action
- relevant staffing ratios are met, where applicable
- each child in Early Years Foundation Stage is assigned a key person

The Role of Staff:

Our school staff are particularly important as they are in a strong position to identify concerns early, provide help for children, promote children's welfare, and prevent concerns from escalating. All staff understand that they have a responsibility to provide a safe environment in which children can learn and should be prepared to identify children who may benefit from early help. Early help means providing support as soon as a problem emerges at any point in the child's life, from foundation years through to teenage years.

Galileo Multi Academy Trust is committed to protecting and safeguarding the welfare of all children in our care and expect all staff to share in this commitment.

School staff will:

- be aware of the systems within school which supports safeguarding
- know who their DSL/DDSL/safeguarding team is in school and what their role in safeguarding is
- if they have a concern about a child's welfare or a child tells them they are being abused immediately follow the school's child protection procedures
- read at least Part one, Part five and Annex B of Keeping Children Safe in Education, what to do if you're worried a child is being abused, the school's Staff Handbook, and Online Safety Policy and the school's safeguarding response to children who go missing from education, immediately raising any concerns they may have around discharging their role and responsibilities with the DSL
- understand safeguarding and promoting the welfare of children is everyone's responsibility and will consider, at all times, what is in the best interest of the child
- be aware that children may not feel ready or know how to tell someone or that they may not recognise their experiences as harmful. This will not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child
- staff understand the importance of determining how best to build trusted relationships with children which facilitate communication
- follow the Teachers' Standards 2012, which state that teachers (which includes headteachers) should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties
- regularly attend appropriate safeguarding and child protection training/updates including online safety including filtering and monitoring, as required, but at least annually
- be aware of their local early help process and the process for making referrals to children's social care, the statutory assessment under the Children Act 1989, especially section 17 (children in need) section 47 (a child suffering, or likely to suffer, significant harm) and understand their role they might be expected to play in such assessments
- understand what to do if a child tells them they are being abused, exploited, or neglected and maintain an appropriate level of confidentiality. This means only involving those who need to be involved, such as the DSL and children's social care
- never promise a child they will not tell anyone about a report of abuse
- have a zero-tolerance reassure victims that they are being taken seriously and that they will be supported and kept safe
- never give a victim the impression that they are creating a problem by reporting abuse, sexual violence, or sexual harassment
- ensure a victim is never made to feel ashamed for making a report
- provide professional challenge
- if in exceptional circumstances, the DSL/DDSL is not available, consider speaking to a member of the senior leadership team and/or take advice from local children's social care. In these circumstances, any action taken should be shared with the DSL/DDSL as soon as is practically possible
- understand that they and the school play a crucial role in preventative education and that this is most effective in the context of a whole-school approach that prepares pupils for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment
- assume a colleague or another professional will act and share information that might be critical in keeping children safe
- will be aware of the signs of abuse and neglect and maintain an attitude of 'it could happen here'
- follow the school's referral process if they have a concern
- understand that if a child is in immediate danger or is at risk of harm, they can make an immediate referral to children's social care and/or the police. Informing the DSL as soon as possible that a referral has been made
- if after a referral the child's situation does not appear to be improving, will press for reconsideration to ensure their concerns have been addressed until the child's situation improves
- know how to manage the requirement to maintain an appropriate level of confidentiality and follow

the published information sharing guidance

- record on the school's child protection reporting system all concerns, discussions and decisions made and the reason for the decision
- use the DSL as a source of support and safeguarding knowledge
- refer concerns about the behaviour of another staff member, supply teacher, contractor, or volunteer, immediately to the headteacher
- If the concern is about the headteacher, refer their concern immediately to the chair of governors

Appendix 2 – Categories of Abuse

Categories of abuse

Physical abuse:

A form of abuse which 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:

The persistent emotional maltreatment of a child, such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual abuse:

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include 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. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Females can also be abusers as can other children. The sexual abuse of children by other children is a specific safeguarding issue (also known as peer-on-peer abuse) in education and all staff should be aware of it and their school's policy and procedures for dealing with it.

Neglect:

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 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); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Appendix 3 – Key Safeguarding Topics

Key Safeguarding Topics

Child Criminal Exploitation (CCE)

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting, or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation, as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Child Criminal & Sexual Exploitation (CCE & CSE)

Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in criminal or 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 and/or through violence or the threat of violence. CCE and CSE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

Child Sexual Exploitation (CSE)

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge, for example through others sharing videos or images of them on social media.

CSE can affect any child who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. Some children may not realise they are being exploited, for example they believe they are in a genuine romantic relationship.

Sextortion involves people being forced into paying money or meeting another financial demand, after an offender has threatened to release nude or semi-nude photos of them. This could be a real photo taken by the victim, or a fake image created of them by the offender.

The [Centre of Expertise on Child Sexual Abuse](#) has introduced new resources to help education professionals identify and respond to concerns of child sexual abuse and abusive behaviours. The Department for Education also provides access to the [Child sexual exploitation: guide for practitioners](#).

County Lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of “deal line”. This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store, and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can be targeted and recruited into county lines in several locations including any type of schools (including special schools), further and higher educational institutions, pupil referral units, children’s homes and care homes.

Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

A number of the indicators for CSE and CCE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- go missing and are subsequently found in areas away from their home
- have been the victim or perpetrator of serious violence (e.g., knife crime)
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs
- are exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection
- are found in accommodation that they have no connection with, often called a ‘trap house or cuckooing’ or hotel room where there is drug activity
- owe a ‘debt bond’ to their exploiters
- have their bank accounts used to facilitate drug dealing.

Further information on the signs of a child’s involvement in county lines is available in guidance published by the [Home Office and The Children’s Society County Lines Toolkit For Professionals](#)

Child on Child Abuse

Staff in our schools are aware that children can abuse other children. This can happen both inside and outside of school as well as online. All staff should be able to recognise the indicators and signs of child-on-child abuse, be clear as to their school’s policy and procedures, the important role they have to play in preventing and responding where they believe a child may be a risk of it.

All staff should read Part 5 of Keeping Children Safe in Education and understand that even if there are no reports in their schools it does not mean it is not happening, it may be the case that abuse is not being reported. As such it is important that when staff have any concerns regarding child-on-child abuse they should speak to their designated safeguarding lead (or deputy).

School staff understand the importance of challenging inappropriate behaviours between children, examples of which are listed below, that are abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

Child-on child abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between children (sometimes known as ‘teenage relationship abuse’)

- physical abuse such as hitting, kicking, shaking, biting, hair pulling, 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 add/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.

* *Consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive – but children still need to know it is illegal- whilst non-consensual is illegal and abusive. Our school will follow GOV.UK's [Searching Screening and Confiscation Advice for schools](#) and [Sharing nudes and semi-nudes: Advice for education settings working with children and young people](#)*

** *The Voyeurism Offences Act, which was commonly known as the Upskirting Bill, came into force on 12 April 2019.*

Full details on our procedures to minimise the risk of child-on-child abuse, and how to manage allegations can be found in the school's Behaviour Policy.

Children who are absent from Education

All staff are made aware that children going missing, particularly repeatedly or for prolonged periods, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, forced marriage come from Gypsy, Roma or Traveller families or new migrant families. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future.

Our schools understand their duty to have an Admission and Attendance Register and place all pupils on both. The school follows its duty to report to the local authority if a pupil fails to attend school on an agreed start date, fails to attend school regularly, or has been absent without our permission for 10 school days or more, at such intervals as instructed by the local authority. They will notify the local authority, within five days, when a pupil's name is added to the Admission Register. When a pupil's name is deleted from the Register, they will notify the local authority as soon as the ground for deletion is met and no later than the time at which the pupil's name is deleted, as set out in the [Education \(Pupil Registration\) \(England\) Regulations 2006](#) as amended.

Excellent attendance is expected of all children, but when children are unwell parents are expected to confirm absence by telephone/text immediately. If there is no notification each school has a policy for following up non-attendance to ascertain each child's whereabouts.

Each school works closely with the local authority whenever a child's attendance and punctuality cause concern. Positive measures are in place to encourage children to attend regularly and punctually and the school is aware of its right to take legal action against parents who do not ensure good attendance and punctuality.

Our schools have dedicated staff who will monitor unauthorised absences, particularly where children go

missing on repeated occasions and follow local authority procedures.

We have regard to the statutory guidance [Children Missing Education](#) and [Working together to improve school attendance](#)

Children who are Lesbian, Gay, Bisexual, or gender questioning

The fact that a child or a young person may be lesbian, gay, or bisexual is not in itself an inherent risk factor for harm. However, they can sometimes be targeted by other children. In some cases, a child who is perceived by other children to be lesbian, gay or bisexual (whether they are or not) can be just as vulnerable as children who are. Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and provide a safe space for them to speak out or share their concerns with members of staff.

Our schools understand the importance of working with families.

LGBT inclusion is part of our statutory [Relationships Education, Relationship and Sex Education and Health Education](#) curriculum.

We acknowledge that the DfE expects to publish the revised guidance on gender questioning children and will update this policy accordingly once it is published.

Racist and Homophobic Incidents

Our school's values the individuality of all our pupils. We are committed to giving all our children every opportunity to achieve the highest standards. Within this ethos of achievement, we do not tolerate bullying or harassment of any kind. Our Race Equality Policy reflects the general and specific duties on schools as detailed in the [Race Relations Act 1976](#) and as amended by the Race Relations Amendment Act 2000. We have regard to the Department for Education specific [guidance on bullying including homophobic and transphobic bullying and bullying related to sexual orientation, transgender, disability, race and religion](#). Schools will follow their local safeguarding partners guidance on reporting and recording all racist and homophobic incidents, using existing national and local protocols for multi-agency liaison with the police and local authority children's social care

All forms of so-called HBA are abuse (regardless of the motivation) and will be handled and escalated as such.

Children with Special Educational Needs and Disabilities or Health Issues

All schools recognise that pupils with special educational needs or disabilities (SEND) or certain medical or physical health conditions can face additional safeguarding challenges both online and offline. Additional barriers can exist when recognising abuse, neglect and exploitation 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
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
- the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- communication barriers and difficulties in managing or reporting these challenges
- cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or the consequences of doing so

Trust schools will offer extra pastoral support for these children, along with ensuring any appropriate support for communication is in place.

Further information can be found in the Department's: [SEND Code of Practice 0 to 25 and Supporting Pupils at School with Medical Conditions](#).

Consensual & Nonconsensual sharing of nude/semi-nude images

Consensual and non-consensual sharing nudes and semi-nude images and/or videos (also known as sexting or youth produced imagery) is when someone shares sexual, naked, or semi-naked images or videos of themselves, or others, or sends sexually explicit messages. They can be sent using mobiles, tablets, smartphones, laptops, or any device that allows the sharing of media and messages.

All incidents must be reported to the DSL, as soon as practically possible who will follow the guidance [Advice for Schools and Colleges on Responding to Sexting Incidents](#) and [Searching Screening and Confiscation Advice](#) for schools. The key consideration is for staff not to view or forward illegal images of a child.

Safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside the school. All staff, but especially the DSL (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to), sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines and radicalisation. Staff are aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life. Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

In all cases, if staff are unsure, they should always speak to the DSL (or deputy).

Domestic Abuse

The cross-government definition of domestic violence and abuse is: any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. Older children may also experience domestic abuse and/or violence in their own personal relationships.

The [Domestic Abuse Act \(2021\)](#) captures a range of different abusive behaviours, which are not limited to: physical, emotional and economic abuse and coercive and controlling behaviour.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Operation Encompass Operation Encompass operates in all police forces across England. It helps police and schools work together to provide emotional and practical help to children. This ensures that the school has up to date relevant information about the child's circumstances and can enable immediate support to be put in place, according to the child's needs.

Operation Encompass does not replace statutory safeguarding procedures. Where appropriate, the police

and/or schools should make a referral to local authority children's social care if they are concerned about a child's welfare. More information about the scheme and how schools can become involved is available on the Operation Encompass website.

Operation Encompass provides an advice and helpline service for all staff members from educational settings who may be concerned about children who have experienced domestic abuse. The helpline is available 8:00 to 13:00, Monday to Friday on 0204 513 9990 (charged at local rate).

National Domestic Abuse Helpline

Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked.

Additional advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

- [NSPCC- UK domestic-abuse Signs Symptoms Effects](#)
- [Refuge what is domestic violence/effects of domestic violence on children](#)
- [Safelives: young people and domestic abuse.](#)

Early Help

Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years. All staff are made aware of the local early help process via regular training and updates and understand their role in it and are prepared to identify children who may benefit from early help.

Any child may benefit from early help, but as a school we are particularly alert to the potential need for early help for a child who:

- is disabled and has specific additional needs
- has special educational needs (whether or not they have a statutory education, health and care plan)
- has a mental health need
- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups
- is frequently missing/goes missing from education, home or care
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- is at risk of being radicalised or exploited
- has a parent or carer in custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing drugs or alcohol themselves
- has returned home to their family from care
- is at risk of 'honour-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child
- is persistently absent from education, including persistent absences for part of the school day

If early help is appropriate, the DSL/DDSL will lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff should be aware they may be required to support other agencies

and professionals in an early help assessment, in some cases acting as the lead practitioner. Further guidance on effective assessment of the need of early help can be found in [Working Together to Safeguard Children](#).

Elective Home Education (EHE)

We would expect the parents' decision to home educate to be made with their child's best education at the heart of the decision. However, this is not the case for all, and home education can mean some children are less visible to the services that are there to keep them safe and supported in line with their needs.

We will inform the LA of all deletions from the admission register when a child is taken off roll.

Where a parent/carer has expressed their intention to remove a child from a school with a view to educating at home, schools must work together with the LA and other key professionals to coordinate a meeting with parents/carers where possible. Ideally, this would be before a final decision has been made, to ensure the parents/carers have considered what is in the best interests of each child. This is particularly important where a child has special educational needs or a disability, and/or has a social worker, and/or is otherwise vulnerable.

Forced/Child Marriage

Forcing a person into a marriage is a crime in England and Wales. 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. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Our schools understand that as a school we can play an important role in safeguarding children from forced marriage.

All staff are made aware of the indicators of forced marriage and all concerns are reported immediately to the DSL who will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care.

Multi-agency statutory guidance for dealing with forced marriage, can be found in chapter 8 of [The right to choose: government guidance on forced marriage](#). School staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fm@fcdo.gov.uk.

In addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

We believe child-on-child abuse is abuse and should never be tolerated or passed off as "banter", "part of growing up", "just having a laugh" or "boys being boys". Different gender issues can be prevalent when dealing with child-on-child abuse. This could for example include girls being sexually touched/assaulted or boys being subject to initiation-type violence.

We recognise that children who are abused or neglected may find it difficult to develop a sense of self-worth and to view the world in a positive way. Whilst at school, their behaviour may be challenging. We recognise that some children who have experienced abuse may harm others. We will always take a considered and sensitive approach in order that we can support all our pupils. We will ensure the child's wishes and feelings are considered when determining what action to take and what services to provide. Allowing children to express their views and give feedback and always operating with the best interests of the child at their heart.

Any form of abuse or harmful behaviour will immediately be reported to the DSL and will be dealt with immediately and consistently under the school's Behaviour Policy, to reduce the extent of harm to the child, with full consideration to impact on that individual child's emotional and mental health and well-being.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL (and any deputies) are aware of contact details and referral routes into the local housing authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse, and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the local housing authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

The [Homelessness Reduction Act 2017](#) places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The following factsheets usefully summarise the new duties: [Homeless Reduction Act Factsheets](#). The new duties shift focus to early intervention and encourage those at risk to seek support as soon as possible before they are facing a homelessness crisis.

In most cases school staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, they should also recognise in some cases 16 and 17-year-olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's social care will be the lead agency for these children and the DSL (or a deputy) will ensure appropriate referrals are made based on the child's circumstances. The Department and the Ministry of Housing, Communities and Local Government have published joint statutory guidance on the provision of accommodation for 16 and 17 year olds who may be homeless and/or require accommodation and can be found [here](#).

Honour-based Abuse & Female Genital Mutation

Honour-based Abuse

So-called HBA encompasses incidents and crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage (FM), and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of these dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

If staff have a concern regarding a child who might be at risk of HBA or who has suffered from HBA, they should speak to the DSL. As appropriate, the DSL will activate local safeguarding procedures.

Female Genital Mutation

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

[Section 5B of the 2003 Act](#) introduces a mandatory reporting duty which requires teachers - this includes

qualified teachers or persons who are employed or engaged to carry out teaching work in schools and other institutions, in England and Wales to report 'known' cases of FGM in under 18s which they identify in the course of their professional work to the police. It will be rare for teachers to see visual evidence, and they should not be examining pupils, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies. Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should also still consider and discuss any such case with the school's DSL and involve children's social care as appropriate. All those in teaching work are made aware of the indicators of FGM and are requested to undertake training. All concerns must be reported immediately to the DSL who will activate local safeguarding procedures, using existing national and local protocols for multiagency liaison with police and children's social care. Female genital mutilation refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK. FGM typically takes place between birth and around 15 years old; however, it is believed that the majority of cases happen between the ages of 5 and 12.

Risk factors for FGM include:

- low level of integration into UK society
- mother or a sister who has undergone FGM
- girls who are withdrawn from PSHE
- visiting female elder from the country of origin
- being taken on a long holiday to the country of origin
- talk about a 'special' procedure to become a woman

Indications that FGM may have already taken place may include:

- difficulty walking, sitting or standing and may even look uncomfortable
- spending longer than normal in the bathroom or toilet due to difficulties urinating
- spending long periods of time away from a classroom during the day with bladder or menstrual problems
- frequent urinary, menstrual or stomach problems
- prolonged or repeated absences from school, especially with noticeable behaviour changes (e.g., withdrawal or depression) on the girl's return
- reluctance to undergo normal medical examinations
- confiding in a professional without being explicit about the problem due to embarrassment or fear.
- talking about pain or discomfort between her legs

Information on when and how to make a report can be found at: [Mandatory reporting of female genital mutilation procedural information](#). The following is a useful summary of the FGM mandatory reporting duty: [FGM Fact Sheet](#).

Looked After and Previously Looked After Children

A child who has been in the care of their local authority for more than 24 hours is known as a looked after child or may be referred to as children in care. Looked after children are those living with foster parents, living in a residential children's home, or living in residential settings like schools or secure units. The most common reason for children becoming looked after is as a result of abuse and/or neglect.

Our schools have appointed a designated teacher for looked after children. The designated teacher has responsibilities under [Section 2E of the Academies Act 2010](#) for promoting educational achievement of children who were adopted from state care outside England and Wales. The designated teacher must have appropriate training and the relevant qualifications and experience. They should also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her. The designated safeguarding lead should have details of the child's social worker and the name of

the virtual school head in the authority that looks after the child.

A previously looked after child (PLAC) potentially remains vulnerable and all staff should have the skills, knowledge and understanding to keep previously looked after children safe. When dealing with looked after children and previously looked after children, our schools understand that it is important that all agencies work together and prompt action is taken when necessary to safeguard these children, who are a particularly vulnerable group.

When the school is considering excluding, either for a fixed term period or permanently, a vulnerable pupil/a child with additional needs and/or a pupil who has social care involvement (is either subject to a S47 Child Protection plan/child in need plan or there are/have previously been child protection concerns), we will undertake an informed (multi-agency where other professionals are involved) risk-assessment prior to making the decision to exclude. Schools would be advised to speak to the named social worker for the child where the exclusion will be to the home to ensure that any risk is assessed and speak to Area Inclusion Partnership for support if required. Schools should note advice in the [Suspension and permanent exclusion guidance September 2023](#) (DfE) Section 3. In situations that a looked after child is at risk of exclusion the school will notify the Virtual School. In the event of a one-off serious incident resulting in an immediate decision to permanently exclude, the risk assessment must be completed prior to convening a meeting of the governing board.

Mental Health & Impact of Abuse

Mental Health

The Trust ensures that schools have clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems. Trust schools have a senior mental health lead, who is part of or supported by the senior leadership team.

All staff should also be aware that 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. It is important to recognise that only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences (ACE's), this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences can impact on their mental health, behaviour, and education.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following the child protection procedures above and speaking to the DSL or a deputy.

The DfE have published practical evidence informed resources to support mental health leads to fulfil their role:

- [Preventing and Tackling Bullying](#),
- [Mental Health and Behaviour in Schools](#)
- [Mental health lead resource hub](#)
- [Targeted support toolkit](#)

In addition, Public Health England has produced a range of resources to support secondary schools to promote positive health, wellbeing, and resilience. These include [Promoting children and young people's](#)

[emotional health and wellbeing](#). Its resources include social media, forming positive relationships, smoking and alcohol. See [Rise Above: Resources for School from Public Health England #esafety | The Education People](#) for links to all materials and lesson plans. The Department has also published, '[Every interaction matters](#)' a pre-recorded webinar which provides staff with a simple framework for promoting wellbeing, resilience, and mental health. This sits alongside our [Wellbeing for education recovery](#) program content, which covers issues such as bereavement, loss, anxiety, stress and trauma.

Impact of Abuse

The impact of child abuse will not be underestimated. Many children do recover well and go on to lead healthy, happy, and productive lives, although most adult survivors agree that the emotional scars remain, however well buried. For some children, full recovery is beyond their reach, and the rest of their childhood and their adulthood may be characterised by anxiety or depression, self-harm, eating disorders, alcohol and substance misuse, unequal and destructive relationships and long-term medical or psychiatric difficulties.

Preventing Radicalisation & Channel

Protecting children from the risk of radicalisation into terrorism is seen as part of schools' wider safeguarding duties and is similar in nature to protecting children from other forms of harm and abuse. During the process of radicalisation, it is possible to intervene to prevent vulnerable people being radicalised.

Extremism: is vocal or active opposition to fundamental British values including democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs.

Radicalisation: refers to the process of a person legitimising support for, or use of, terrorist violence.

Terrorism: The use or threat of serious violence against a person or serious damage to property where that action is:

- designed to influence the government or an international governmental organisation or to intimidate the public or a section of the public; and
- for the purpose of advancing a political, religious, racial or ideological cause.

There is no single way of identifying an individual who is likely to be susceptible to radicalisation into terrorism, there are factors that may indicate concern. However, we understand that we are in a unique position to be able to identify concerning behaviour changes that may indicate a child may be susceptible to radicalisation and that it can happen in many different ways and settings. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media has become a major factor in the radicalisation of young people. As with other safeguarding risks, staff are alert to changes in children's behaviour which could indicate that they may need help or protection. Staff will use their judgement in identifying children who might be at risk of radicalisation and act proportionately, which may include making a referral to the Channel programme.

From 1 July 2015 all Schools, are subject to a duty under [section 26 of the Counter-Terrorism and Security Act 2015](#) ("the CTSA 2015"), in the exercise of their functions, to have "due regard to the need to prevent people from becoming terrorists or supporting terrorism". This duty is known as the Prevent duty.

The Department for Education has also published supporting advice for schools on [managing the risk of radicalisation](#).

All staff are made aware of the indicators of radicalisation and alert to changes in pupil's behaviour. Further information and a list of 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 report and all concerns immediately to the DSL who will activate local safeguarding procedures, using existing national and local protocols for multiagency liaison with police and children's social care.

All Trust schools will complete a Prevent Risk Assessment that is updated at least annually.

Channel

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being susceptible to being drawn into terrorism. Prevent referrals are assessed and may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are at risk of being drawn into terrorism and consider the appropriate support required. A representative from the school may be asked to attend the Channel panel to help with this assessment. An individual will be required to provide their consent before any support delivered through the programme is provided.

Promoting Modern Values

In line with the advice given under [The Prevent duty \(2015\)](#), we aim to promote the spiritual, moral, social and cultural development of pupils and, within this, fundamental modern values.

Private Fostering

Private fostering occurs when a child under the age of 16 (under 18, if disabled) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative in their own home. A child is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer. Such arrangements may come to the attention of school staff through the normal course of their interaction, and promotion of learning activities, with children.

Whilst most privately fostered children are appropriately supported and looked after, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from

another country. In some cases, privately fostered children are affected by abuse and neglect, or be involved in trafficking, child sexual exploitation or modern-day slavery.

Our schools understand where the arrangements come to the attention of the school (and the school is not involved in the arrangements), they should then notify the local authority to allow the local authority to check the arrangement is suitable and safe for the child. Schools who are involved (whether or not directly) in arranging for a child to be fostered privately must notify local authorities of the arrangement as soon as possible after the arrangement has been made.

Notifications must contain the information specified in Schedule 1 of The Children (Private Arrangements for Fostering) Regulations 2005 and must be made in writing.

Comprehensive guidance on private fostering can be found here: [Private fostering: local authorities.](#)

Pupils who need a Social Worker (Child in Need and Child Protection Plans)

Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse and/or neglect and/or exploitation and/or complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour, and mental health.

Trust schools are aware that local authorities should share the fact a child has a social worker, and the DSL should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare, and educational outcomes. This will be considered as a matter of routine. There are clear powers to share this information under existing duties on both local authorities and schools to safeguard and promote the welfare of children.

Where children need a social worker, this will inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

We acknowledge that, in September 2024, the role of Virtual School Heads was further extended to include a non-statutory responsibility to promote the educational achievement of all children in kinship care. Non-statutory guidance on [Promoting the education of children with a social worker and children in kinship care arrangements](#) contains further information on the roles and responsibilities of Virtual School Heads.

Serious Violence

All staff are made aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation. In addition, staff are aware of the range of factors which increase the likelihood of involvement in serious violence such as:

- being male
- having been frequently absent or permanently excluded from school
- having experienced child maltreatment
- being involved in offending e.g. theft or robbery

Staff will notify the DSL immediately if they are concerned about any child.

Further information can be found in [Preventing youth violence and gang involvement](#) and [Criminal exploitation of children and vulnerable adults: county lines guidance](#).

Sexual Violence/Sexual Harassment and Harmful Sexual Behaviour

Sexual violence and sexual harassment can occur between two children of any age and sex from primary to secondary stage and into colleges. It can also occur online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

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. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and face to face (both physically and verbally) and are never acceptable.

Galileo Multi Academy Trust's schools are aware of the importance of:

- making clear that there is a zero-tolerance approach to sexual violence and sexual harassment, that it is never acceptable, and it will not be tolerated. It should never be
- passed off as “banter”, “just having a laugh”, “a part of growing up” or “boys being boys”. Failure to do so can lead to a culture of unacceptable behaviour, an unsafe environment and in worst case scenarios a culture that normalises abuse, leading to children accepting it as normal and not coming forward to report it
- recognising, acknowledging, and understanding the scale of harassment and abuse and that even if there are no reports it does not mean it is not happening, it may be the case that it is just not being reported
- challenging physical behaviour (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

It is essential that all victims 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.

Whilst any report of sexual violence or sexual harassment should be taken seriously, staff are aware it is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys. Children with special educational needs and disabilities (SEND) are also three times more likely to be abused than their peers.

Sexual violence: Staff are aware of sexual violence and the fact children can, and sometimes do, abuse other children in this way and that it can happen both inside and outside of school. When referring to sexual violence we are referring to child on child sexual violence and sexual violence offences under the [Sexual Offences Act 2003](#) as described below:

Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus, or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not

consent to the penetration and A does not reasonably believe that B consents.

Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents. (Schools should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.)

Causing someone to engage in sexual activity without consent: A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.)

What is consent? Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal, or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

Further information about consent can be found here: [Rape Crisis England & Wales - Sexual consent](#)

- a child under the age of 13 can never consent to any sexual activity
- the age of consent is 16
- sexual intercourse without consent is rape

Sexual harassment: When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school. When we reference sexual harassment, we do so in the context of child-on-child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded, or humiliated and/or create a hostile, offensive, or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as:
 - telling sexual stories
 - making lewd comments
 - making sexual remarks about clothes and appearance
 - calling someone sexualised names
- sexual "jokes" or taunting
- physical behaviour, such as:
 - deliberately brushing against someone*
 - interfering with someone's clothes*
 - displaying pictures, photos, or drawings of a sexual nature
- online sexual harassment.
 - this may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence

It may include:

- consensual and non-consensual sharing of nudes and semi-nudes images and/or videos. As set out in [UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)
- taking and sharing nude photographs of U18s is a criminal offence

- sharing of unwanted explicit content
- sexualised online bullying
- unwanted sexual comments and messages, including, on social media; and
- coercing others into sharing images of themselves or performing acts they are not comfortable with online.

** Schools should be considering when any of this crosses a line into sexual violence*

Harmful Sexual Behaviour (HSB)

Children’s sexual behaviour exists on a wide continuum, from normal and developmentally expected, to inappropriate, problematic, abusive, and violent. Problematic, abusive, and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is “harmful sexual behaviour” (HSB). The term has been widely adopted in child protection. HSB can occur online and/or face to face and can also occur simultaneously between the two. HSB should be considered in a child protection context.

When considering HSB, ages and the stages of development of the children are critical factors. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years’ difference or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature.

If staff have a concern about a child or a child makes a report to them, they will follow their school’s referral process. If staff are in any doubt as to what to do, they should speak to the DSL (or a deputy).

Responding to a report of sexual violence or sexual harassment

It is important to note that children may not find it easy to tell staff about their abuse verbally. Children can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report. For example, a friend may make a report, or a member of school staff may overhear a conversation that suggests a child has been harmed, or a child’s own behaviour might indicate that something is wrong. As per Part one of Keeping Children Safe in Education, if staff have any concerns about a child’s welfare, they should act on them immediately rather than wait to be told.

Our school’s initial response to a report from a child is incredibly important. Staff understands that how they respond to a report can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward. All victims will be reassured that they are being taken seriously, regardless of how long it has taken them to come forward and that they will be supported and kept safe. Abuse that occurs online or outside of the school will not be downplayed and will be treated equally seriously. A victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment or be made to feel ashamed for making a report or their experience minimised.

School staff should not assume that someone else is responding to any incident or concern. If in any doubt, they should speak to the DSL (or a deputy). In such cases, the basic safeguarding principles remain the same, but it is important for the school to understand why the victim has chosen not to make a report themselves. This discussion will be handled sensitively and with the support of children’s social care if required.

There may be reports that the alleged sexual violence or sexual harassment involves pupils from the same school but is alleged to have taken place away from the school premises, or online. There may also be reports where the children concerned attend two or more different schools. The safeguarding principles, and

schools' duties to safeguard and promote the welfare of our pupils remain the same. In such circumstances, appropriate information sharing and effective multi-agency working will be especially important.

All school staff will be trained to manage a report following their local safeguarding partners' guidelines. However, effective safeguarding practice includes:

if possible, managing reports with two members of staff present, (preferably one of them being the designated safeguarding lead or a deputy). However, this might not always be possible

- where the report includes an online element, being aware of searching screening and confiscation advice (for schools) and the UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people. The key consideration is for staff not to view or forward illegal images of a child. The highlighted advice provides more details on what to do when viewing an image is unavoidable. In some cases, it may be more appropriate to confiscate any devices to preserve any evidence and hand them to the police for inspection
- not promising confidentiality at this initial stage as it is very likely a concern will have to be shared further (for example, with the DSL or children's social care) to discuss next steps. Staff should only share the report with those people who are necessary in order to progress it. It is important that the victim understands what the next steps will be and who the report will be passed to
- recognising that a child is likely to disclose information to someone they trust: this could be anyone on the school staff. It is important that the person to whom the child discloses recognises that the child has placed them in a position of trust. They should be supportive and respectful of the child
- recognising that an initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory and so children may not be able to recall all details or timeline of abuse
- keeping in mind that certain children may face additional barriers to telling someone because of their vulnerability, disability, sex, ethnicity and/or sexual orientation
- listening carefully to the child, reflecting back, using the child's language, being non-judgmental, being clear about boundaries and how the report will be progressed, not asking leading questions and only prompting the child where necessary with open questions – where, when, what, etc. It is important to note that whilst leading questions should generally be avoided, staff can ask children if they have been harmed and ask what the nature of that harm was
- considering the best way to make a record of the report. Best practice is to wait until the end of the report and immediately write up a thorough summary. This allows the staff member to devote their full attention to the child and to listen to what they are saying. It may be appropriate to make notes, especially if a second member of staff is present. However, if making notes, staff should be conscious of the need to remain engaged with the child and not appear distracted by the note taking. Either way, it is essential a written record is made
- only recording the facts as the child presents them. The notes should not reflect the personal opinion of the note taker. Schools should be aware that notes of such reports could become part of a statutory assessment by children's social care and/or part of a criminal investigation
- informing the DSL (or deputy), as soon as practically possible, if the DSL (or deputy) is not involved in the initial report

Confidentiality

All school staff are aware that they should never promise confidentiality as it is very likely that it will be in the best interest of the victim to seek advice and guidance from others in order to provide support and engage appropriate agencies. Schools will only engage staff and agencies who are required to support the children involved and/or be involved in any investigation.

What should staff do if they are asked not to tell anyone about the sexual violence or sexual harassment? There are no easy or definitive answers when a victim makes this request. If the victim does not give consent

to share information, staff may still lawfully share it, if it can be justified to be in the public interest, for example, to protect children from harm and to promote the welfare of children. The staff member should pass the concern onto the DSL (or deputy) who will follow Keeping Children Safe in Education guidance.

The DSL (or deputy) is likely to have a complete safeguarding picture and be the most appropriate person to advise on the schools' initial response.

Important considerations will include:

- the wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. This will however need to be balanced with the school duty and responsibilities to protect other children
- the nature of the alleged incident(s), including: whether a crime may have been committed and/or whether HSB has been displayed
- the ages of the children involved
- the developmental stages of the children involved
- any power imbalance between the children. For example, is an alleged perpetrator significantly older, more mature, or more confident? Does the victim have a disability or learning difficulty?
- if the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature)
- that sexual violence and sexual harassment can take place within intimate personal relationships between peers
- are there ongoing risks to the victim, other children, adult students or school staff?; and
- other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation

The starting point regarding any report will always be that there is a zero- tolerance approach to sexual violence and sexual harassment and it is never acceptable, and it will not be tolerated. School staff understand that it is especially important, not to pass off any sexual violence or sexual harassment as 'banter', 'just having a laugh', part of growing up' or 'boys being boys' as this can lead to a culture of unacceptable behaviours and an unsafe environment for children

As always when concerned about the welfare of a child, all staff will act in the best interests of the child. In all cases, schools will follow general safeguarding principles as per Keeping Children Safe in Education.

Immediate consideration should be given as to how best to support and protect the victim and the alleged perpetrator(s) (and any other children involved/impacted).

Ongoing response

All Trust schools will base ongoing responses on effective safeguarding practice. School staff should think carefully about terminology it uses to describe the "victim". The needs and wishes of the victim should be paramount (along with protecting the child) in any response. It is important they feel in as much control of the process as is reasonably possible. Wherever possible, the victim if they wish, should be able to continue in their normal routine. Overall, the priority should be to make the victim's daily experience as normal as possible, so that the school is a safe space for them.

Consideration will be given to the age and the developmental stage of the victim, the nature of the allegations and the potential risk of further abuse. Schools should be aware that, by the very nature of sexual violence and sexual harassment, a power imbalance is likely to have been created between the victim and alleged perpetrator(s). The victim should never be made to feel they are the problem for making a report or made to feel ashamed for making a report. The DSL (or deputy) will be tailored support on a case- by-case basis. The

support required regarding a one-off incident of sexualised name-calling is likely to be vastly different from that for a report of rape.

When it is clear that ongoing support will be required, schools will ask the victim if they would find it helpful to have a designated trusted adult (for example, their form tutor or DSL) to talk to about their needs. The choice of any such adult should be the victim's (as far as reasonably possible). Schools should respect and support this choice.

School staff understand that a victim of sexual violence is likely to be traumatised and, in some cases, may struggle in a normal classroom environment. While schools should avoid any action that would have the effect of isolating the victim, in particular from supportive peer groups, there may be times when the victim finds it difficult to maintain a full-time timetable and may express a wish to withdraw from lessons and activities. This should be because the victim wants to, not because it makes it easier to manage the situation. If required, schools should provide a physical space for victims to withdraw.

It may be necessary for schools to maintain arrangements to protect and support the victim for a long time. Schools should be prepared for this and should work with children's social care and other agencies as required. It is therefore important that the designated safeguarding lead knows how and where to seek support.

It is important that the school do everything they reasonably can to protect the victim from bullying and harassment as a result of any report they have made. Whilst they should be given all the necessary support to remain in their school, if the trauma results in the victim being unable to do this, alternative provision or a move to another school should be considered to enable them to continue to receive suitable education. This should only be at the request of the victim (and following discussion with their parents or carers).

It is important that if the victim does move to another educational institution (for any reason), that the new school is made aware of any ongoing support needs. The DSL will take responsibility to ensure this happens (and should discuss with the victim and, where appropriate, their parents or carers as to the most suitable way of doing this) as well as transferring the child protection file.

Safeguarding and supporting the alleged perpetrator(s) and children and young people who have displayed harmful sexual behaviour

All Trust schools will base ongoing responses on effective safeguarding practice. Schools should think carefully about the terminology it uses to describe the 'alleged perpetrator(s) or perpetrators

. Our schools will have a difficult balancing act to consider. On one hand they need to safeguard the victim (and all other children, adult students, and staff at the school) and on the other hand provide the alleged perpetrator(s) with an education, safeguarding support as appropriate and implement any disciplinary sanctions. Taking disciplinary action and still providing appropriate support are not mutually exclusive actions. They can, and should, occur at the same time if necessary.

A child abusing another child may be a sign they have been abused themselves or a sign of wider issues that require addressing within the culture of the school. Our schools should work with professionals as required to understand why a child may have abused a peer. It is important to remember that, as a child, any alleged perpetrator(s) is entitled to, deserving of, and should be provided with, a high level of support to help them understand and overcome the reasons for their behaviour and help protect other children by limiting the likelihood of them abusing again.

Schools will consider the age and the developmental stage of the alleged perpetrator(s) and nature and frequency of the allegations. Any child will likely experience stress as a result of being the subject of allegations

and/or negative reactions by their peers to the allegations against them. In addition, they will consider the proportionality of the response. Support (and sanctions) should be considered on a case-by-case basis. An alleged perpetrator(s) may potentially have unmet needs (in some cases these may be considerable) as well as potentially posing a risk of harm to other children. HSB in young children may be (and often are) a symptom of either their own abuse or exposure to abusive practices and or materials. The DSL (or deputy) will take, as appropriate, advice and guidance from children's social care, specialist sexual violence services, police, or external specialist organisations.

Discipline and the alleged perpetrators

With regard to the alleged perpetrator(s), [advice on behaviour in schools for headteachers 2022](#) is clear that teachers can discipline pupils whose conduct falls below the standard which could be reasonably expected of them.

Exclusions statutory guidance for maintained schools, academies and PRUs is [here](#). Disciplinary action can be taken whilst other investigations by the police and/or children's social care are ongoing. The fact that another body is investigating or has investigated an incident does not in itself prevent a school from coming to its own conclusion, on the balance of probabilities, about what happened, and imposing a penalty accordingly. The DSL from each school should carefully considered on a case-by-case basis.

The school will consider if, by taking any action, it would prejudice an investigation and/or any subsequent prosecution. Careful liaison with the police and/or children's social care should help the school make a determination. It will also be important to consider whether there are circumstances that make it unreasonable or irrational for the school to reach its own view about what happened while an independent investigation is considering the same facts.

Discipline and support

Taking disciplinary action and still providing appropriate support are not mutually exclusive actions. They can, and should, occur at the same time if necessary. The school should be very clear as to what its approach is.

On the one hand there is preventative or forward-looking action to safeguard the victim and/or the perpetrator(s), especially where there are concerns that a perpetrator themselves may have been a victim of abuse; and, on the other, there is disciplinary action to punish a perpetrator for their past conduct. The school should be very clear as to which category any action they are taking falls or whether it is really both and should ensure that the action complies with the law relating to each relevant category.

Working with parents and carers

Our schools will, in most instances, engage with both the victim's and the alleged perpetrator's parents or carers when there has been a report of sexual violence (this might not be necessary or proportional in the case of sexual harassment and should be considered on a case-by-case basis). The exception to this rule is if there is a reason to believe informing a parent or carer will put a child at additional risk. Schools should carefully consider what information they provide to the respective parents or carers about the other child involved and when they do so. In some cases, children's social care and/or the police will have a very clear view and it will be important for the school to work with relevant agencies to ensure a consistent approach is taken to information sharing.

It is good practice for the school to meet the victim's parents or carers with the victim present to discuss what arrangements are being put in place to safeguard the victim and understand their wishes in terms of support they may need and how the report will be progressed. In addition, it is also good practice for the school to meet with alleged perpetrator's parents or carers to discuss any arrangements that are being put into place that impact an alleged perpetrator, such as, for example, moving them out of classes with the victim and what this means for their education. The reason behind any decisions should be explained. Support for the alleged perpetrator should be discussed. It would be the DSL (or a deputy) who would generally attend any such

meetings. Consideration to the attendance of other agencies should be considered on a case-by-case basis.

Clear behaviour policies and child protection policies, especially policies that set out the principles of how reports of sexual violence will be managed and how victims and alleged perpetrators are likely to be supported, that parents and carers have access to, will, in some cases, help manage what are inevitably very difficult conversations. Parents and carers may well struggle to cope with a report that their child has been the victim of an assault or is alleged to have assaulted another child. Details of organisations that support parents are provided in Annex A. Schools should consider signposting parents and carers to this support.

Safeguarding other children

Consideration will be given to supporting children (and adult students) who have witnessed sexual violence, especially rape and assault by penetration. Witnessing such an event is likely to be traumatic and support may be required.

Following any report of sexual violence, or sexual harassment it is likely that some children will take “sides”.

The school will be doing all they can to ensure both the victim and alleged perpetrator(s), and any witnesses, are not being bullied or harassed. Social media is very likely to play a central role in the fall out from any incident or alleged incident. There is the potential for contact between victim and alleged perpetrator(s) and a very high likelihood that friends from either side could harass the victim or alleged perpetrator(s) online and/or become victims of harassment themselves.

School transport is a potentially vulnerable place for a victim or alleged perpetrator(s) following any incident or alleged incident. The school, as part of its risk assessment, should consider any additional potential support needed to keep all their children safe.

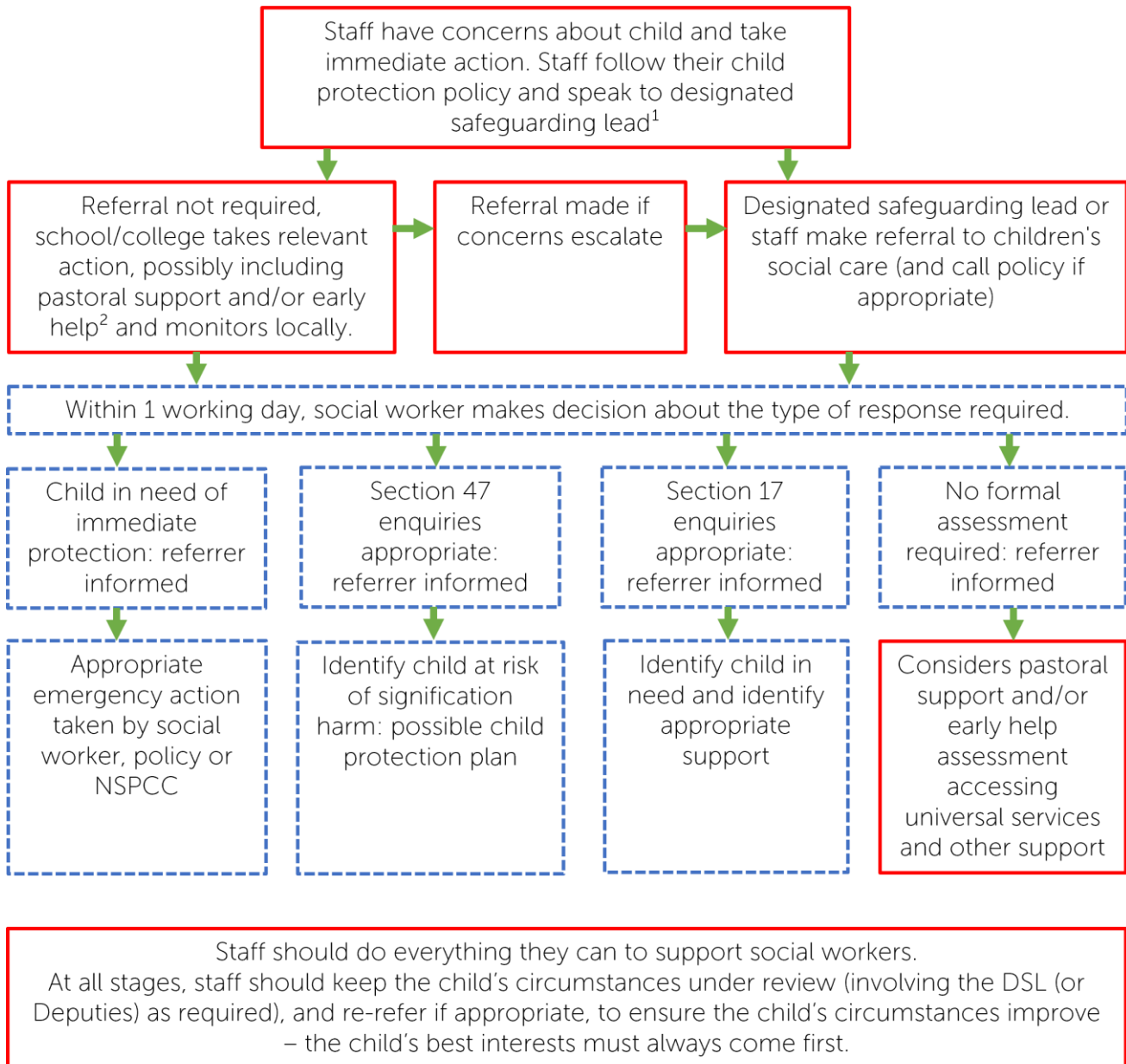
A whole school approach to safeguarding, a culture that makes clear that there is a zero-tolerance approach to sexual violence and sexual harassment and that it is never acceptable, and it will not be tolerated, and a strong preventative education programme will help create an environment in which all children at the school are supportive and respectful of their peers when reports of sexual violence or sexual harassment are made.

Our schools understand the importance that they keep their policies, processes, and curriculum under constant review to protect all their children. Reports of sexual violence and/or harassment (especially where there is evidence of patterns of behaviour) may point to environmental and or systemic problems that could and should be addressed by updating relevant policies, processes, or relevant parts of the curriculum.

Galileo Multi Academy Trust and all schools follow departmental advice Keeping Children Safe in Education.

Appendix 4 – Actions where there are concerns about a child flowchart

Actions where there are concerns about a child



Colour Key:

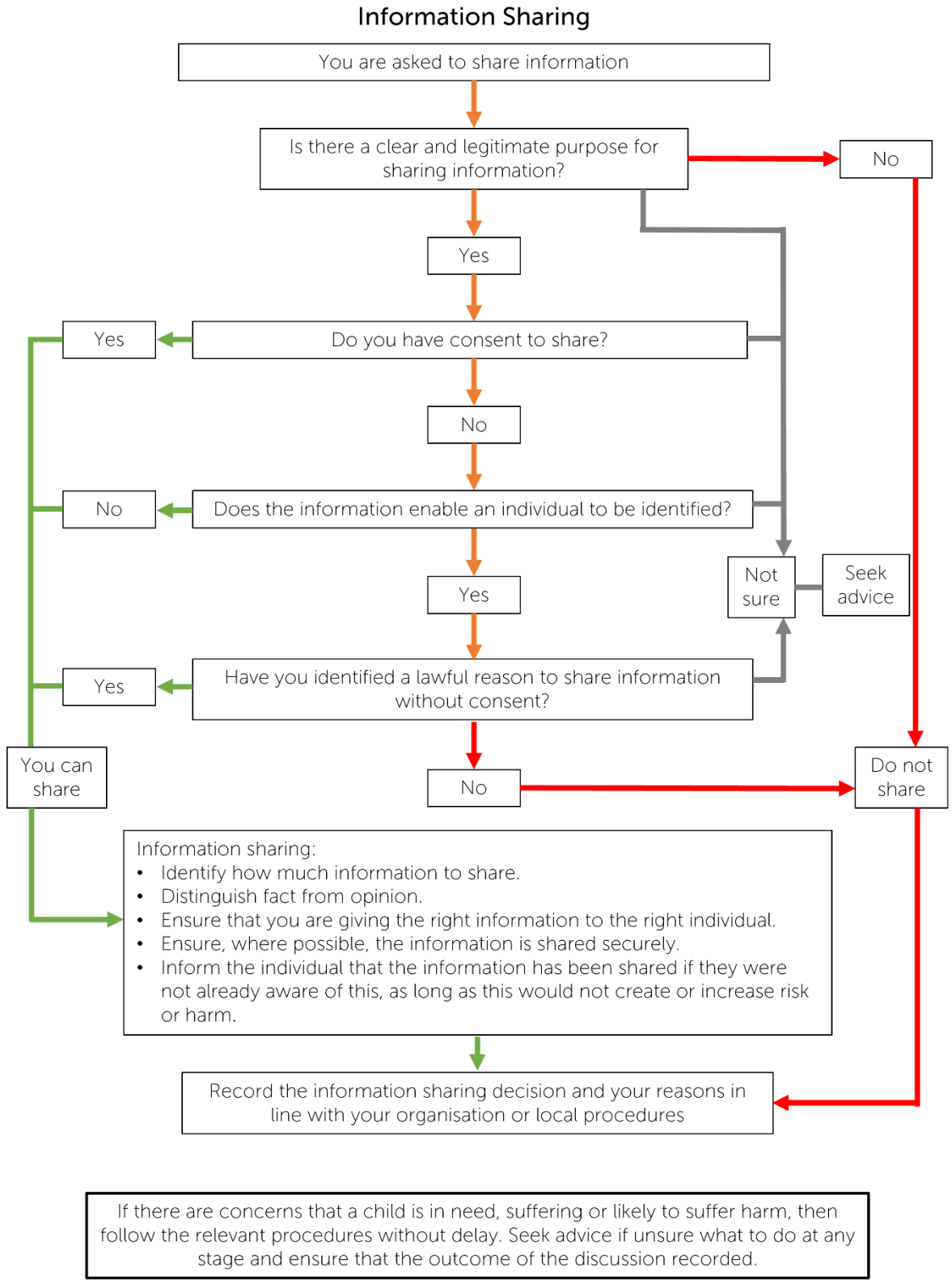
School/College Action

Other Agency Action

Appendix 5 – Information Sharing

When and how to share information

Information sharing: Advice for safeguarding practitioners – image from 2018 guidance



Appendix 6 – Responding to allegations or low-level concerns flowchart

Responding to allegations or lower-level concerns around behaviour of an adult towards a child

