Safeguarding and Child Protection Policy

Last Reviewed: September 2026

Document Control			
Review period	12 Months	Next review	September 2027
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 2026

Changes to note	Reason for change *e.g. change in legislation*
Whole policy restructured and condensed for clarity and conciseness, with no loss of statutory content	Improved clarity and readability
Safer Recruitment and Volunteers sections corrected to reflect the removal of the DBS supervision exemption	Change in legislation (Crime and Policing Act 2026)
Terminology and statutory references updated: 'Early Help' to 'Family Help', with explicit reference to sections 10, 11, 17, 20, 31 and 47 of the Children Act 1989/2004	Reflects current KCSIE guidance
Staff reading requirements clarified: Part one, Part five and Annex A of KCSIE, alongside this policy and the Trust's full suite of safeguarding policies	Improved clarity of statutory requirements
DSL role restructured and condensed, including strengthened cover arrangements (confidential shared safeguarding mailbox)	KCSIE requirement for robust DSL cover; improved clarity
Preventative education and topic coverage updated: VAWG, Young Carers, Child-to-Parent Abuse, and gender-questioning children	Reflects current KCSIE guidance
Online safety guidance updated: the 4 Cs framework, annual filtering and monitoring review, mobile-free schools and wearable devices	Reflects current KCSIE and DfE online safety guidance
Sport safeguarding and medical conditions (including allergy management) sections reviewed	Reflects current KCSIE and DfE guidance
New legislative references added: Children's Wellbeing and Schools Act (Temporary Accommodation Notification Duty) and the Operation Encompass statutory duty	Change in legislation
Trust/CEO notification requirements and information sharing guidance clarified	Improved clarity of escalation and notification routes
Key Safeguarding Topics condensed and reordered alphabetically; Categories of Abuse retained and cross-referenced	Improved clarity and navigability
Virtual School Head role: added non-statutory responsibility for attendance oversight of children with a social worker	Statutory guidance not previously reflected in policy
New section added: Regulations and Safeguarding Requirements Relating to School Premises (Toilets, Changing Rooms and Showers)	Statutory guidance not previously reflected in policy
Data protection references updated to include the Data (Use and Access) Act 2025	Change in legislation
Appendix 4 Flowchart	Reflects current KCSIE guidance

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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 2026). 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 acknowledge that any child may benefit from support before statutory intervention, including from universal services and community-based Early Help, or the targeted early help level of Family Help. All school staff should be particularly alert to the potential need for additional support for a child 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 pregnant and/or is a parent themselves
- has exhibited early signs of abusive, violent and/or harmful behaviours
- 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
- has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of being permanently excluded from schools and in Alternative Provision or a Pupil Referral Unit
- is at risk of exploitation, modern slavery, trafficking, including criminal or sexual exploitation
- is at risk of being radicalised into terrorism
- 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 alcohol and other drugs themselves
- is at risk of honour or faith-based abuse such as Female Genital Mutilation or Forced Marriage, and
- is a privately fostered child.

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, trainee teachers, 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 A 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: Contact details:	Jane Spence 01642 777963 Jane@galileotrust.co.uk
The Trust Nominated Safeguarding Trustee is: Contact details:	John Hind john.hind@galileotrust.co.uk

Local Safeguarding Contact Numbers

Role	Name	Contact
Headteacher	Tim Bethell	Tim.Bethell@ingsfarmprimary.co.uk
Designated Safeguarding Lead (DSL)	Amanda Ley	Safeguarding@ingsfarmprimary.co.uk
Deputy Designated Safeguarding Lead (DDSL)	Sarah Matthews	Safeguarding@ingsfarmprimary.co.uk
Deputy Designated Safeguarding Lead (DDSL)	Tim Bethell	Safeguarding@ingsfarmprimary.co.uk
Mental Health Lead	Amanda Ley	ALey@ingsfarmprimary.co.uk
SENCO	Amanda Ley	ALey@ingsfarmprimary.co.uk
Senior member of Staff responsible for LAC/PLAC	Tim Bethell	Tim.Bethell@ingsfarmprimary.co.uk
Headteacher of Virtual School for our Local Authority	Jo Johnson	Virtual.School@redcar-cleveland.gov.uk
Chair of Governors	Neil Young	NYoung@ingsfarmprimary.co.uk
Governor for Safeguarding	Katie Brown	kbrown@ingsfarmprimary.co.uk
Local Safeguarding Children Services	Redcar & Cleveland Multi-Agency Children's Hub (MACH)	RedcarMACH@redcar-cleveland.gov.uk 01642 130700
Local Authority Designated Officer (LADO) for allegations against professionals	Redcar & Cleveland LA LADO	RedcarLADO@redcar-cleveland.gov.uk 01642 130700

Email contact for Safeguarding at Galileo Multi Academy Trust is: safeguarding@ingsfarmprimary.co.uk – address concerns FAO: Mr Bethell

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:

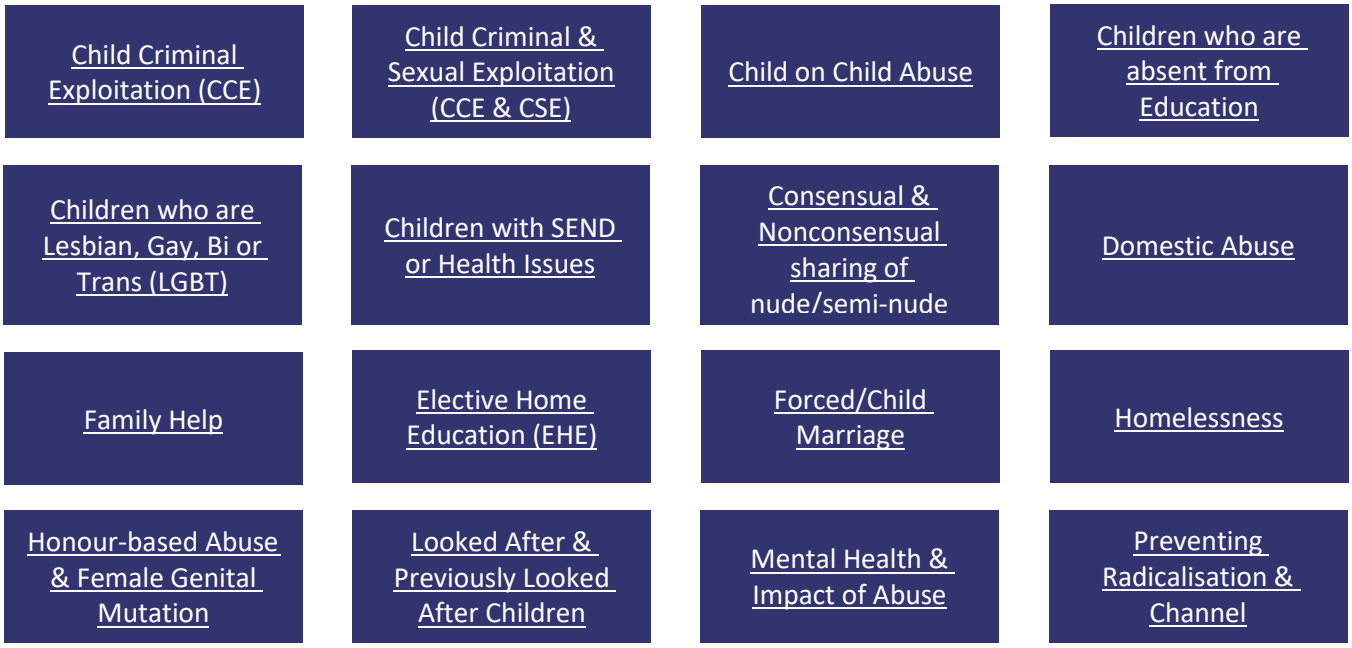


However, abuse, neglect, exploitation and safeguarding issues are rarely standalone events and cannot be covered by one definition or label alone. In most cases, multiple issues will overlap with one another.

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



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 the safeguarding issues that can put children at risk of harm, including drug and alcohol misuse, missing education, serious violence (including county lines), radicalisation, and the consensual or non-consensual sharing of nudes and semi-nudes. Staff understand the local authority's child protection reporting procedures, in line with Working Together to Safeguard Children and What to Do If You're Worried a Child is Being Abused. Annex A of KCSIE covers further issues staff should be aware of, including child abduction, exploitation, modern slavery and community safety incidents, children's involvement in the court system, children with family members in prison, and cybercrime.

It is not staff's responsibility to investigate a welfare concern or determine the truth of a disclosure or allegation, but everyone working directly with children has a duty to recognise concerns and keep an open mind. All concerns must be reported and recorded immediately, following the school's child protection procedures, and discussed with the DSL before any conversation with parents.

Staff should be aware of the systems that support safeguarding in school

This includes knowing who the DSL, DDSLs and wider safeguarding team are and what their roles involve, and reading Part one, Part five and Annex A of KCSIE alongside this policy and Galileo's full suite of safeguarding policies, including the Staff Code of Conduct, the Online Safety Policy, and the school's response to children missing from education. Staff should raise any concerns about discharging their own role with the DSL. Staff follow the Teachers' Standards 2012, which require teachers, including headteachers, to safeguard children's wellbeing and maintain public trust in the profession, and attend safeguarding and child protection training, including online safety, filtering and monitoring, at least annually.

Safeguarding is everyone's responsibility, and staff should always consider what is in a child's best interests. Children may not feel ready or know how to tell someone about their experiences, or may not recognise them as harmful; this shouldn't stop staff from maintaining professional curiosity and speaking to the DSL if they have any concern. Building trusted relationships with children helps make this communication possible.

Staff must immediately report to the DSL any:

- suspicion that a child is injured, marked, or bruised in a way not readily attributable to normal knocks or scrapes from play
- explanation given that seems inconsistent or suspicious
- behaviour giving rise to suspicion a child may have suffered harm, such as worrying drawings or play
- concern that a child may be suffering inadequate care, ill treatment, or emotional maltreatment
- concern that a child is showing signs or symptoms of abuse or neglect
- significant change in a child's presentation, or unexplained or persistent absence from education
- hint or disclosure of abuse from any person
- concern about a person who may pose a risk to children, for example living in a household with children present

  Individual indicators will rarely provide conclusive evidence of abuse on their own; they should be treated as part of a jigsaw, with each piece helping the DSL decide how to proceed. It's important that staff report their concerns without needing absolute proof that a child is at risk.

Referring to Family Help and children's social care

Staff should be aware of the process for community-based Family Help assessments, including the criteria and level of need for referral to Family Help support at the targeted early help level (under sections 10 and

11 of the Children Act 2004), or to statutory services under section 17 of the Children Act 1989 (children in need, including disabled children); and the criteria for referral to local authority children's social care for assessment and statutory services under section 47 of the Children Act 1989 (reasonable cause to suspect a child is suffering, or likely to suffer, significant harm), including under section 31 (care and supervision orders) and section 20 (the duty to accommodate a child). This also covers clear procedures for cases involving the abuse, neglect or exploitation of children, children managed within the youth secure estate, and disabled children. Further detail on these processes is set out in Community-based Early Help Assessment and Statutory Children's Social Care Assessments and Services.

Responding to a disclosure or concern

If a child discloses abuse, exploitation or neglect, staff maintain an appropriate level of confidentiality, involving only those who need to be involved, such as the DSL and children's social care. Staff never promise a child they won't tell anyone, and always reassure victims they are being taken seriously and will be supported and kept safe, without ever giving the impression they are creating a problem, or making them feel ashamed for reporting. Staff provide professional challenge where needed, and never assume a colleague or another professional will act on information that might be critical to keeping a child safe; they stay alert to the signs of abuse and neglect and hold an attitude of "it could happen here."

If the DSL or a deputy is exceptionally unavailable, staff should speak to a member of the senior leadership team and/or take advice from local children's social care, sharing any action taken with the DSL or deputy as soon as practically possible. If a child is in immediate danger or at risk of harm, staff can refer directly to children's social care and/or the police, informing the DSL as soon as possible afterwards. If a child's situation doesn't appear to be improving after a referral, staff should press for reconsideration until it does.

Staff record all concerns, discussions and decisions, and their rationale, on the school's child protection reporting system, following published information sharing guidance to manage confidentiality appropriately, and use the DSL as an ongoing source of support and safeguarding knowledge.

Concerns about another adult's behaviour

Staff refer any concern about the behaviour of another adult, such as a staff member, supply teacher, trainee teacher, contractor, or volunteer, immediately to the headteacher, or to the Chair of Governors if the concern is about the headteacher. Full detail on managing these concerns is set out in the Managing Allegations and Low-Level Concerns Policy.

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 'i**t 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 appropriate referral

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 and Health Education. 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, racism, misogyny/misandry, Violence Against Women and Girls (VAWG), homophobia, biphobic, sexual violence/harassment, derogatory behaviour or other forms of physical violence and conflict. 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
- understanding online harms such as sharing images, the prevalence of deepfakes, pornography and misogynistic influencers and when and where to seek help

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 pupil's 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 below as well as the use of mobile phones, cameras, wearable 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.

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 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, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories.

Contact: being subjected to harmful online interaction with other users or generative AI applications that simulate this, 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 making or 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 Departments 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. Review of the effectiveness is carried out at least once every academic year. Reviews are carried out by the SLT member responsible for filtering and monitoring, with the support of the IT support. The checks include that filtering is working appropriately on all internet-connected devices in all relevant locations, and a record should be kept of these checks.

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

Pupils using mobile devices in school

All our schools are mobile device free, including the use of wearable technology environments by default; anything other than this will be by exception only. Further information can be found in our Mobile Phone Policy.

Artificial intelligence (AI)

Generative artificial intelligence (AI) tools are now widespread and easy to access. Staff, pupils and parents/carers may be familiar with generative chatbots such as ChatGPT and Google 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 policies 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 school's requirements for filtering and monitoring also apply to the use of AI, in line with Keeping Children Safe in Education.

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.

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 review 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

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.

The fact that there has been an incident relating to the management of a child or young person's medical condition (including allergies) would not in and of itself warrant a referral to local safeguarding partners. A safeguarding referral would only be needed where an incident highlighted concern that the child or young person might be at an increased risk of being neglected, abused or exploited by persons inside or outside of their family unit because of their medical condition. This might occur where relevant information about a child or young person's medical condition is not provided to a school or where they are repeatedly sent without essential medication, thereby putting the individual at risk. Further information is provided in the statutory guidance on Supporting Pupils at School with Medical Conditions and Allergy safety in schools and the Trusts Supporting Pupils with Medical Conditions Policy.

All staff present during times when pupils are scheduled to be on site should receive allergy awareness training, this includes catering staff and others who may oversee children at breakfast or after school clubs. Further information is provided in our Allergy 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 necessary for the least amount of time'. 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. Following the removal of the DBS supervision exemption (Crime and Policing Act 2026), where this regular contact meets the definition of regulated activity, an enhanced DBS check with barred list check is required regardless of any supervision arrangements in place. The outcomes of the checks carried out.

Schools will ensure that our volunteers are appropriately checked when in school (as per the removal of Supervision Exemption for volunteers (Crime and Policing Act 2026).

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.
- adhere 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, who will consider whether onward referral to the LADO is required
- 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 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, trainee 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, the Data (Use and Access) Act 2025 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

When deciding what information to share, our schools should consider:

- the relevancy of the information, including to the current safeguarding risk,
- what is necessary for the receiving setting to know,
- whether it is clearly presented and appropriately contextualised.

Professional judgement should be used to ensure that the information shared is focused and proportionate. This may include summarising or omitting information which is not necessary for safeguarding purposes. But care should be taken not to omit information where it may be relevant to understanding or managing safeguarding risk. This is further supported by the new information sharing duty, which is intended to give staff greater confidence to share information appropriately and in a timely way to safeguard children.

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.

Data protection laws do not prevent the sharing of information for the purposes of keeping children safe and promoting their welfare. If in any doubt about sharing information, staff should speak to the designated safeguarding lead (or a deputy). Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare of children.

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.

Regulations and Safeguarding Requirements Relating to School Premises

This section reflects requirements under the School Premises (England) Regulations 2012, the Education (Independent School Standards) Regulations 2014, and Part 6 of the Equality Act 2010. Where a gender-questioning child does not wish to use facilities designated for their biological sex, schools will consider alternative arrangements without compromising the provision of single-sex facilities for other children (see 'Children who are Lesbian, Gay, Bisexual, or Gender Questioning').

Toilets

Children must not be allowed into toilets designated for the opposite biological sex, including where a request to support social transition has been made. Separate toilets must be provided for boys and girls aged 8 and over, other than individual, lockable toilets used by one pupil at a time. Where mixed-sex toilets are also provided, schools will assess safeguarding risks and ensure these are individual, lockable rooms opening onto a public area such as a corridor. Any alternative arrangements made for a gender-questioning child must not compromise the safety, comfort, privacy or dignity of that child or of others, and must be recorded, communicated appropriately, and reviewed regularly.

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, wearable 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 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, keep 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 provision 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 our 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.
- Following the removal of the DBS supervision exemption for volunteers (Crime and Policing Act 2026), any trustee, governor, or volunteer carrying out regulated activity must hold an enhanced DBS check with barred list check; supervision no longer removes this requirement.
- 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 in 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 A 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 must undergo appropriate training and relevant qualifications and experience.

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

Role of the Designated Safeguarding Lead
In accordance with Keeping Children Safe in Education, the governing body has appointed a senior leader as Designated Safeguarding Lead (DSL) to take lead responsibility for safeguarding and child protection, including online safety, within the school. Each school also has Deputy Designated Safeguarding Leads (DDSLs), trained to the same standard, to whom safeguarding activities can be delegated; the ultimate lead responsibility for child protection remains with the DSL, and this is explicit in the role holder's job description.

The DSL should have the status and authority to carry out the role, along with the time, funding, training, resources and support needed to do it effectively. Their responsibilities include advising and supporting other staff on child welfare and safeguarding matters, taking part in (or supporting others to take part in) strategy discussions and inter-agency meetings, and contributing to the assessment of children.

Managing Referrals

The DSL is expected to refer:

- suspected abuse and neglect to local authority children's social care, and support staff who make such referrals
- radicalisation concerns to the Channel programme, and support staff who make such referrals
- cases where someone has been dismissed or has left due to risk or harm to a child, to the Disclosure and Barring Service
- cases where a crime may have been committed, to the police, using NPCC guidance on when to call the police to help decide

Working with Others

The DSL is expected to:

- act as a source of support, advice and expertise for all staff, and as the point of contact with safeguarding partners
- keep the headteacher informed of issues, especially ongoing section 47 enquiries and police investigations, including awareness of a child's right to an Appropriate Adult (see PACE Code C 2023)
- liaise, as required, with the case manager and the LADO for child protection concerns involving a staff member
- liaise with staff, including teachers, pastoral staff, school nurses, IT technicians, senior mental health leads and SENCOs, on safety, safeguarding and welfare matters (including online safety), and with relevant agencies when considering a referral, so a child's needs are considered holistically
- liaise with the senior mental health lead and, where available, the mental health support team, where a safeguarding concern is linked to mental health
- promote supportive engagement with parents and carers in safeguarding children, including where families face challenging circumstances
- work with the headteacher and relevant strategic leads to promote the educational outcomes of children in need, by knowing the welfare and safeguarding issues they are experiencing or have experienced, and their impact on attendance, engagement and achievement. This includes knowing the school's cohort of children who have or have had a social worker, understanding their academic progress, and supporting staff to provide additional support or reasonable adjustments, recognising that the impact of a social worker's involvement can last well beyond the end of statutory intervention

Managing the Child Protection File
The DSL is responsible for keeping child protection files up to date. Information should be kept confidential and stored securely, ideally with a separate file for each child, and records should be clear and factual, distinguishing between observed concerns, professional opinion, and historic information. Records should include a clear, comprehensive summary of the concern, details of how it was followed up and resolved, and a note of any action taken, decisions reached, and the outcome.

Files should only be accessed by those who need to see them, and any sharing should follow the information sharing advice in Parts one and two of KCSIE. Appropriate arrangements should ensure safeguarding information is transferred, reviewed and actioned promptly at all transition points, including in-year moves; the DSL should ensure a child's file is transferred to their new school as soon as possible, within 5 days for an in-year transfer, or within the first 5 days of a new term. The file should be transferred separately from the main pupil file, with secure transit and confirmation of receipt, and should include a clear, structured summary of current safeguarding concerns, relevant context, and any ongoing support needs, rather than just a transfer of unstructured historic records.

Particular care should be taken to distinguish current concerns from historic information, presenting past issues with appropriate context. Receiving schools should ensure the information is reviewed by an appropriately trained member of staff, used to support rather than disadvantage the child, and should seek clarification if it's unclear or incomplete. Key staff, such as the DSL and SENCO, should be made aware as required, with the DSL deciding what further information should be shared with other staff, and when.

Beyond the child protection file itself, the DSL should also consider whether to share further information with a new school in advance of a child leaving, particularly where it would support an assessment of risk to others, for example about a child who has had a social worker or been a victim of abuse, concerns about serious violence or harmful behaviour, or ongoing Channel programme support. It's good practice for DSLs at both settings to speak directly wherever there are issues or concerns, to make sure information is actively considered and acted upon.

Training, Knowledge and Skills

The DSL (and any deputies) should undergo training that gives them the knowledge and skills for the role, updated at least every two years, alongside Prevent awareness training. This should leave them with a good understanding of their own role; how to identify, understand and respond to the specific needs and harms that increase a child's vulnerability; and the processes and responsibilities of other agencies, particularly children's social care, so that they:

- understand the assessment process for Family Help and statutory intervention, including local referral criteria and arrangements
- have a working knowledge of how child protection case conferences and review conferences are run, and can attend and contribute effectively, understanding the DSL's role in supporting children's social care
- understand the lasting impact of adversity and trauma on a child's behaviour, mental health and wellbeing, and how to respond to this in supporting educational outcomes
- are alert to the specific needs of children in need, those with SEND or relevant health conditions, and young carers, and understand the importance of information sharing within the school and with safeguarding partners and other agencies
- understand and support the school's Prevent duty responsibilities, and can advise staff on protecting children from radicalisation
- understand the unique risks of online safety, keeping their knowledge and capability current, including the additional online risks SEND children face, such as bullying, grooming and radicalisation, and are confident supporting them
- can access resources and attend relevant or refresher training, and encourage a culture across the school of listening to children and taking account of their wishes and feelings, including in any protective measures put in place

Beyond formal training, the DSL's knowledge should be refreshed regularly, and at least annually, for example through e-bulletins, networking with other DSLs, or reading up on safeguarding developments, so they stay current in the role.

Raising Awareness and Supporting Staff

The DSL should ensure every member of staff, especially new and part-time staff, has access to and

understands the school's child protection policy and procedures; that the policy is reviewed at least annually, with procedures updated and reviewed regularly in partnership with governing bodies; and that it's publicly available, so parents know how referrals about suspected abuse or neglect work and the school's role in this. The DSL links with safeguarding partner arrangements to keep staff aware of training opportunities and local policy updates, and helps promote educational outcomes by sharing relevant welfare and safeguarding information about children who have or have had a social worker with teachers and school leadership.

Training should also develop the DSL's (and deputies') expertise to support and advise staff confidently on welfare, safeguarding and child protection matters, including ensuring staff feel supported through the referral process, and helping them see how safeguarding, welfare and educational outcomes are connected, including through academic and pastoral support.

Holding and Sharing Information
The DSL 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), and with safeguarding partners and other agencies; to understand relevant data protection law; and to keep detailed, accurate, secure written records of all concerns, discussions and decisions, including the rationale, whether or not a referral was ultimately made.

Availability
During term time, the DSL (or a deputy) should always be available during school hours for staff to discuss safeguarding concerns. This is generally expected to be in person, though it's for each school, working with the DSL, to define what "available" means and whether phone or video-call availability is acceptable in exceptional circumstances; schools also arrange appropriate cover for out-of-hours or out-of-term activities.

Our schools have robust cover arrangements for when the DSL is unavailable due to illness, leave, or other circumstances, so there is always a clear, known route for concerns to be raised, including a confidential shared mailbox to ensure concerns are received, monitored and acted upon without delay.

Deputy Designated Safeguarding Leads
Deputies should be trained to the same standard as the DSL, with the role made explicit in their job description. While DSL activities can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection remains with the DSL and cannot be delegated.

The Trust
Galileo Multi Academy Trust trustees hold strategic leadership responsibility for the Trust's safeguarding arrangements. They safeguard and promote children's welfare, have regard to statutory guidance, ensure the suitability of adults working in and with schools, and receive appropriate training to give them the knowledge needed to keep safeguarding policies and procedures effective.

Trustees delegate monitoring of safeguarding in schools to local Governing Boards, and the Trust ensures mechanisms are in place across schools to help staff understand and discharge their statutory safeguarding roles. Trustees focus on the core functions set out in the Academy Trust Handbook: clarity of vision, ethos and strategic direction; holding executive leaders to account for educational performance; and overseeing effective financial performance.

Governors
Governing bodies ensure each school appoints a Governor Safeguarding Lead, whose details are publicly available, to monitor the effectiveness of this policy. Governors ensure mechanisms are in place to help staff discharge their safeguarding roles, that the school works with local safeguarding partners and contributes to multi-agency working in line with Working Together to Safeguard Children, and that everyone involved in governance reads the latest version of KCSIE in full, with a record kept of this. Governors ensure schools meet their responsibilities under Part 2 of KCSIE and comply with the law at all times.

As part of this, governors will:

- have a senior board-level lead for safeguarding, with an explicit job description (see the Role of the Designated Safeguarding Lead)
- ensure all governors receive regular safeguarding and child protection training, including online safety and filtering and monitoring
- be aware of their obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), data protection law and UK GDPR, and local authority safeguarding arrangements
- understand that safeguarding is a lawful basis for sharing special category personal data without consent, where it isn't possible or reasonable to gain consent, where gaining consent would place a child at risk, or where the serious harm test is met, and that fears about information sharing should never stand in the way of protecting a child
- ensure the Safeguarding and Child Protection Policy is effective, developed in line with locally agreed multi-agency arrangements, updated at least annually, and available on the school's website, with each school's policy reflecting its own approach to child-on-child abuse, reporting systems, online safety and SEND
- maintain an appropriate Staff Code of Conduct, regularly reviewed, covering low-level concerns, allegations against staff, whistleblowing, acceptable use of technology (including mobile and wearable devices), and staff/pupil relationships and communications, including on social media
- maintain a Behaviour Policy that includes measures to prevent bullying, including cyberbullying and prejudice-based or discriminatory bullying
- have safeguarding responses, understood by all staff, for children who go missing from education, particularly repeatedly or for prolonged periods, to help identify the risk of abuse, neglect or exploitation, and prevent further absence
- have a safeguarding training strategy so all staff meet KCSIE's training requirements, recognising staff expertise and encouraging them to help shape safeguarding arrangements and policy
- have a written Recruitment and Selection Policy to prevent people who pose a risk of harm from working with children, taking proportionate decisions on checks beyond the minimum required, and ensuring volunteers are risk-assessed and appropriately supervised if not fully checked
- appoint a designated teacher, under sections 4 to 6 of the Children and Social Work Act 2017, to work with local authorities to promote the educational achievement of looked after children, including those adopted from state care outside England and Wales, ensuring they are appropriately trained and qualified
- maintain and regularly review the single central record for completeness and accuracy, covering all staff, including supply staff and trainee teachers on salaried routes
- consider how children are taught about safeguarding, including online safety, through the curriculum, covering relevant issues through RSE and PSHE as set out in KCSIE
- ensure the Chair of Governors takes responsibility for liaising with the local authority and other agencies if an allegation is made against the headteacher

The Headteacher

The headteacher is responsible for implementing this policy, and will ensure:

- it is reviewed annually and ratified by the governing body
- all staff read Part one, Part five and Annex A of the latest KCSIE, this policy, the Staff Code of Conduct, and the Behaviour and Online Safety Policy, and that mechanisms are in place to help them understand and discharge their role
- all child protection concerns and disclosures are treated as an utmost priority, actioned immediately, recorded on the school's child protection system, and followed up by the DSL
- there is sufficient time, training, support and resources, including cover arrangements, for the DSL and deputies to carry out their roles effectively, including assessing pupils and attending strategy discussions and other meetings
- all staff receive an induction covering, as a minimum, the Safeguarding and Child Protection Policy, the Behaviour and Online Safety Policy, the Staff Code of Conduct, the school's response to children missing from education, Part one and Part five of KCSIE and Annex A, what to do if worried a child is being abused, safeguarding and child protection training (including online safety,

filtering and monitoring), and any other training relevant to their role
- all staff feel able to raise concerns about poor or unsafe practice through the whistleblowing procedures
- children are taught about safeguarding, including online safety, through the curriculum, as set out in KCSIE
- liaison with the LADO happens before any action is taken where an allegation or concern is raised against a staff member, supply teacher, contractor, or organisation renting the school's facilities
- relevant staffing ratios are met where applicable, and every child in the Early Years Foundation Stage is assigned a key person

The Role of Staff
Galileo Multi Academy Trust is committed to protecting and safeguarding the welfare of all children in our care, and expects all staff to share in this commitment. Our school staff are particularly well placed to identify concerns early, provide help for children, promote their welfare, and prevent concerns from escalating.

Full detail on what staff need to know and do, including how to recognise and report a concern, referring to Family Help and children's social care, and responding to a disclosure, is set out in What Staff Need to Know and Do earlier in this policy.

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. It may include verbal abuse, such as persistent criticism, belittling, or name-calling, as well as not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual abuse:
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 penetration with an object) 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 child-on-child 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

Child Abduction and Community Safety Incidents
Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for them. It can be committed by parents or other family members, by people known but not related to the child, such as neighbours, friends and acquaintances, or by strangers.

Other community safety incidents near a school, such as people loitering nearby or unknown adults engaging children in conversation, can also raise concerns among children and parents.

As children get older and are granted more independence, for example when they start walking to school alone, it's important they're given practical advice on staying safe. We teach personal safety through the RSHE curriculum.

Child Criminal & Sexual Exploitation (CCE & CSE)
The National Referral Mechanism (NRM) is the UK's framework for identifying and supporting victims of exploitation and modern slavery. Whatever form it takes, exploitation and modern slavery is child abuse, and relevant child protection procedures must be followed if modern slavery or trafficking is suspected, in line with the Modern Slavery statutory guidance.

Both CCE and CSE occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into criminal or sexual activity, whether in exchange for something the child needs or wants, for the perpetrator's financial gain or status, or through violence or the threat of it. This can be committed or facilitated by an organised network or gang, and the child may identify as part of that group. CCE and CSE can affect any child, and can include children moved for the purpose of exploitation (trafficking), which may constitute modern slavery. A child protection and modern slavery referral should be made wherever a potential victim of CCE or CSE is identified.

Child Criminal Exploitation (CCE)
CCE can include being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting, pickpocketing, vehicle crime, or threatening or committing serious violence. Perpetrators can trap children through threats of violence against them or their families, or by coercing them into debt; children may be coerced into carrying a weapon, or begin carrying one for a sense of protection.

A child cannot consent to being exploited, abused or trafficked, and may not recognise what is happening to them. Staff should recognise the vulnerability of criminally exploited children, particularly older children, and treat them as victims. Girls' experience of criminal exploitation can look very different to boys', and the indicators may differ, but girls are at risk too; both boys and girls who are criminally exploited may also be at higher risk of sexual exploitation.

Child Sexual Exploitation (CSE)
CSE is a form of child sexual abuse. It may involve physical contact, including assault by penetration or non-penetrative acts such as touching outside clothing, or non-contact activity such as involving children in producing sexual images, showing children sexual images or activity, encouraging sexually inappropriate behaviour, or grooming, including online.

CSE can happen over time or as a one-off, and sometimes without the child's immediate knowledge, for example where images or videos are shared by others afterwards. It can affect any child coerced into sexual activity, including 16 and 17 year olds who can legally consent to sex, and is most often committed by someone the child already knows. Some children do not realise they are being exploited and may believe they are in a genuine relationship. As with CCE, victims are not always recognised as such and can be criminalised for actions taken under coercion, so staff should stay alert to the possibility that a child may be being manipulated or groomed without fully understanding it themselves.

Child-on-Child Abuse (including harassment and violence)
Children can abuse other children, both inside and outside school, and online. All staff should be able to recognise the indicators and signs of child-on-child abuse, understand their school's policy and procedures, and know the important role they play in preventing and responding to it.

All staff should read Part 5 of Keeping Children Safe in Education. The absence of reports in a school does not mean it is not happening; it may simply not be reported. Staff should speak to the DSL (or a deputy) about any concern regarding child-on-child abuse, whether they believe it happened on or off-site, and schools should stay alert to when children may be at highest risk during the school day, for example immediately after school.

Staff should challenge inappropriate behaviour between children wherever it occurs. Downplaying such behaviour, 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 behaviour and an unsafe environment, and in the worst cases can normalise abuse to the point that children stop coming forward.

Child-on-child abuse is a safeguarding issue for both the victim and the alleged perpetrator. It is also preventable: recognising behaviours and risk indicators early, and offering timely, evidence-based support, can help prevent a child from going on to commit abuse or violence.

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

- bullying, including cyberbullying, prejudice-based and discriminatory bullying
- abuse within intimate personal relationships between children
- physical abuse such as hitting, kicking, shaking, biting or hair pulling, which may include an online element that facilitates, threatens or encourages it
- serious physical assault and harm, or the threat of harm with a weapon
- sexual violence, such as rape, assault by penetration and sexual assault, which may include an online element
- sexual harassment, such as sexual comments, remarks or jokes, whether standalone or part of a broader pattern
- causing someone to engage in sexual activity without consent, such as forcing them to strip, touch themselves, or engage in sexual activity with a third party
- consensual and non-consensual making or sharing of nudes and semi-nudes
- upskirting: taking a picture under someone's clothing without permission, to view their genitals or buttocks for sexual gratification or to cause humiliation, distress or alarm (an offence since the Voyeurism Offences Act came into force in April 2019)
- initiation or hazing-type violence and rituals, including any online element
- Consensual image-sharing, especially between older children of a similar age, may not be abusive, though children still need to know it is illegal; non-consensual sharing is both illegal and abusive.

Our schools follow Searching, Screening and Confiscation and Sharing Nudes and Semi-Nudes: Advice for Education Settings.

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

Child-to-Parent Abuse (CPA)
Sometimes called Adolescent-to-Parent Violence and Abuse (APVA), child-to-parent abuse is a safeguarding concern involving a child or young person using abusive, controlling, coercive, threatening or violent behaviour towards a parent, carer or other family member. It may be physical, emotional, psychological, verbal or financial, or involve damage to property.

CPA can significantly affect the wellbeing and safety of children, parents and families, and may be linked to a range of other safeguarding needs. We take concerns about CPA seriously, considering them within the wider context of the child's circumstances, with support, assessment and referrals made where necessary in line with local safeguarding procedures.

Children who are Absent from Education
All staff are aware that a child going missing, particularly repeatedly or for prolonged periods, can be a vital warning sign of a range of safeguarding risks, including abuse and neglect (which may include sexual abuse, exploitation or criminal exploitation), mental health problems, substance abuse, risk of travelling to conflict zones, FGM, or forced marriage. Extra sensitivity may also be needed where a family has connections to Gypsy, Roma or Traveller communities, or is a new migrant family. Early intervention helps identify any underlying safeguarding risk and reduce the chance of a child going missing again.

Our schools maintain an Admission and Attendance Register for all pupils, and report to the local authority if a pupil fails to attend on an agreed start date, doesn't attend regularly, or has been absent without permission for 10 school days or more, at intervals set by the local authority. We notify the local authority within five days of a pupil's name being added to the Admission Register, and as soon as the grounds for deletion are met (no later than the deletion itself), in line with the Education (Pupil Registration) (England) Regulations 2006.

We expect excellent attendance from all children. If a child is unwell, parents are expected to confirm this by phone or text immediately; where there's no notification, each school follows its policy for chasing up non-attendance and confirming the child's whereabouts.

Each school works closely with the local authority wherever attendance or punctuality is a concern, uses positive measures to encourage regular, punctual attendance, and is aware of its right to take legal action against parents who don't ensure this. Dedicated staff monitor unauthorised absences, particularly where a child goes missing repeatedly, 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
Being lesbian, gay or bisexual is not in itself a risk factor for harm, but these children can be vulnerable to discriminatory bullying, as can children who are perceived to be LGB whether or not they are. This risk is compounded where a child lacks a trusted adult they can be open with, so staff should work to reduce these barriers and provide a safe space for children to speak out. Schools will consider how to address bullying risks, including through appropriate sanctions.

There has been a significant rise in recent years in children questioning how they feel about being a boy or a girl, including the physical attributes of their sex. It is not for schools to initiate any action in this area; our focus is on responding where a child or their parent has raised a request relating to social transition.

It's common for children to engage in activities less typically associated with their sex, for example at primary age, a girl playing with trucks or a boy wearing clothes seen as feminine. Some young children also go through a period of questioning their gender; for most this does not continue into adulthood, though a small proportion continue to question their gender, and this feeling may intensify around puberty.

We take time to understand the thoughts and feelings of a child questioning their gender, with appropriate professional curiosity about their full experience, remaining alert to potential vulnerabilities including complex mental health or psychosocial needs, for example relating to family, peer, or wider social relationships, including discriminatory bullying.

Accurate information matters for fulfilling our safeguarding duties: schools should record a child's biological sex accurately whenever it is recorded, and ensure relevant staff are aware of it in all cases. Requests for support with social transition should be discussed directly with the headteacher.

LGBT inclusion is part of our statutory Relationships Education, Relationship and Sex Education and Health Education curriculum.

Children with Family Members in Prison
Around 193,000 children in England and Wales have a parent in prison each year, putting them at risk of poor outcomes from poverty, stigma, isolation and poor mental health. The Prisoners' Families Helpline offers free, confidential support and advice for families in contact with the criminal justice system.

These children are more likely to be absent or excluded than their peers, more likely to experience mental ill health or drug and alcohol misuse, and less likely to be in education, training or employment in later life. Staff should offer tailored, trauma-informed and sensitive support to help mitigate potential harm and encourage stability.

Children with Special Educational Needs and Disabilities or Health Issues
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 to recognising abuse, neglect and exploitation in this group can include:

- assumptions that indicators such as behaviour, mood or injury relate to the child's condition, without further exploration
- a greater likelihood of peer group isolation or bullying, including prejudice-based bullying
- the potential to be disproportionately affected by bullying without outwardly showing signs
- communication barriers, or difficulty reporting concerns, including risk that the child does not recognise what is happening to them as abuse
- needs around intimate care, or isolation from others
- greater dependence on adults for care
- difficulty distinguishing fact from fiction in online content, and the risk of repeating that content or behaviour at school without understanding the consequences

Trust schools offer extra pastoral support for these children, alongside any communication support they need.

Further information is available in the SEND Code of Practice: 0 to 25 years and Supporting Pupils at School with Medical Conditions.

Community-based Early Help Assessment
Where a child doesn't need statutory children's services, the DSL (or deputy) will generally lead liaison with other agencies and set up an inter-agency assessment as appropriate. Staff may be asked to support other agencies with this assessment, sometimes acting as lead practitioner; further guidance on assessing the need for Family Help is in Working Together to Safeguard Children.

These cases should be kept under constant review, with a referral to local authority children's social care considered if the child's situation isn't improving, or is getting worse. Qualified lead practitioners who are not social workers can continue to lead work with families up to and including a section 17 assessment.

Consensual & Non-consensual Sharing of Nude/Semi-nude Images
This covers someone sharing sexual, naked or semi-naked images or videos of themselves or others, or sending sexually explicit messages, using any device that allows sharing of media or messages.

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

Safeguarding incidents and behaviours can be linked to factors outside school, or occur between children outside school. All staff, but especially the DSL and deputies, should consider whether children are at risk of abuse or exploitation outside their families. Extra-familial harms take many forms, including sexual abuse and exploitation, abuse within a child's own intimate relationships (including physical, sexual or emotional abuse and stalking), criminal or financial exploitation, serious youth violence, county lines, and radicalisation.

Technology is a significant factor in many safeguarding and wellbeing issues; children are at risk of abuse online as well as face to face, and abuse often takes place across both concurrently. Children can also abuse other children online, through abusive, harassing or misogynistic/misandrist messages, non-consensual sharing of nudes or semi-nudes (especially within chat groups), and sharing abusive images or pornography with those who don't want to receive it.

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

County Lines
County lines is a form of criminal exploitation. A First Responder who identifies a potential victim should complete the relevant child protection and modern slavery referrals, as set out in the Modern Slavery statutory guidance.

County lines describes gangs and organised criminal networks that export illegal drugs using dedicated mobile phone lines, or other "deal lines." This can happen locally as well as across the UK; no minimum distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money, with offenders using coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance.

Children can be targeted and recruited into county lines in a number of settings, including schools, pupil referral units, and children's homes, as well as increasingly online through social media. They can become trapped as gangs manufacture drug debts that need to be worked off, or threaten serious violence or kidnap against victims and their families if they try to leave.

Many of the CCE and CSE indicators above can also apply to county lines. Additional indicators specific to county lines involvement include a child who:

- goes missing from school or home and is later found in areas away from home
- has been the victim, perpetrator or alleged perpetrator of serious violence, such as knife crime
- is involved in receiving requests for drugs via a phone line, or moving, handing over or collecting drugs or money
- is exposed to "plugging," where drugs are concealed internally to avoid detection
- is found in accommodation they have no connection to, often called a "trap house," or somewhere subject to "cuckooing," where there is drug activity
- owes a "debt bond" to their exploiters
- has their bank account used to facilitate drug dealing

Domestic Abuse
The cross-government definition of domestic abuse is any incident or pattern 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. The Domestic Abuse Act 2021 covers a range of abusive behaviours, including physical, emotional and economic abuse, and coercive and controlling behaviour. Older children may also experience domestic abuse in their own personal relationships.

Children can witness and be adversely affected by domestic abuse between family members even where they are not its direct target. Exposure can have a serious, lasting emotional and psychological impact; a child may blame themselves for the abuse, or may have had to leave the family home as a result.

Operation Encompass
Operation Encompass is an information-sharing scheme between the police and schools, operating across all police forces in England. Since November 2025, the police have had a statutory duty to notify a child's education setting (and, where relevant, the local authority) if they have reasonable grounds to believe a child may be a victim of domestic abuse. This covers any child connected to a household where a domestic abuse incident occurred, whether or not the child was physically present. It places no new responsibilities on schools; the aim is to help schools provide timely, informed support based on up-to-date information about a child's circumstances.

Operation Encompass does not replace normal safeguarding procedures and applies only to domestic abuse incidents; schools should still make a referral to children's social care wherever they have wider welfare concerns.

The DSL is likely to be the Key person for Operation Encompass notifications and is responsible for making any onward safeguarding referrals, keeping records, and liaising with families as appropriate. A notification will typically include the child's details and relationship to those involved, the police reference number, the location, time and date of the incident, whether the child was present, the voice of the child (what they said or how they behaved), and relevant context such as previous incidents. It should never include details of any sexual offence disclosed at the same incident. Notifications, and all information shared under Operation Encompass, must be handled confidentially and in line with data protection law.

The Operation Encompass charity runs an advice line for school staff on 0204 513 9990 (local rate), 8:00am to 1:00pm, Monday to Friday.

Further support

- National Domestic Abuse Helpline (Refuge): free and confidential, 24 hours, 0808 2000 247
- NSPCC: domestic abuse
- Refuge: support for children
- SafeLives: Safe Young Lives, young people and domestic abuse
- Operation Encompass: information for schools
- Home Office guidance on controlling or coercive behaviour

Elective Home Education (EHE)

We would expect a parent's decision to home educate to be made with their child's best education at heart. This isn't always the case, and home education can mean some children become less visible to the services meant to keep them safe and supported.

We inform the local authority of all deletions from the admission register when a child is taken off roll. Where a parent or carer expresses an intention to remove a child from school to educate at home, schools will work with the local authority and other key professionals to coordinate a meeting with them where possible, ideally before a final decision is made, to ensure they've considered what is in the child's best interests. This is particularly important where a child has SEND, a social worker, or is otherwise vulnerable.

Forced/Child Marriage

Forcing a person into marriage is a crime in England and Wales. A forced marriage is one entered into without full and free consent, where violence, threats, or any other form of coercion (physical, emotional or psychological) is used, or where a person cannot consent, for example due to a learning disability. Some communities use religion or culture to coerce a person into marriage, and our schools understand we can play an important role in safeguarding children from it.

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

Multi-agency statutory guidance can be found in The Right to Choose: government guidance on forced marriage. Staff can contact the Forced Marriage Unit for advice on 020 7008 0151 or fmu@fcdo.gov.uk.

Since February 2023, it has also been a crime to do anything intended to cause a child to marry before their eighteenth birthday, even without violence, threats or coercion. As with the existing forced marriage law, this applies to unofficial, non-legally-binding ceremonies as well as legal marriages.

Homelessness

Being homeless, or at risk of becoming homeless, presents a real risk to a child's welfare. The DSL (and any deputies) know the contact details and referral routes into the local housing authority, so concerns can

be raised and progressed at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse, anti-social behaviour, or being asked to leave a property. Referrals or discussions with the local housing authority should be progressed as appropriate, in line with local procedures, but this does not replace a referral to children's social care where a child has been harmed or is at risk of harm.

The Homelessness Reduction Act 2017 places a duty on English councils to give everyone who is homeless or at risk of homelessness meaningful help, including a needs assessment, a personalised housing plan, and support to retain or find accommodation, shifting the focus to early intervention. See the Homelessness Reduction Act factsheets for a summary.

Most homelessness concerns will involve children living with their families, but staff should also recognise that some 16 and 17 year olds live independently, for example following exclusion from the family home, and need a different level of support. Children's social care leads for these young people, and the DSL (or deputy) will make appropriate referrals based on the child's circumstances. Joint statutory guidance on accommodation for homeless 16 and 17 year olds is available here.

Temporary Accommodation Notification Duty
The Children's Wellbeing and Schools Act places a duty on local housing authorities in England to notify schools, health visiting services and GP practices when a child is placed in temporary accommodation, where consent has been given by a parent, someone with parental responsibility, or the child themselves if they're a 16-17 year old living independently.

This notification helps schools safeguard these children and support their outcomes at the earliest opportunity, but doesn't replace existing safeguarding duties or a referral to children's social care where a child has been, or is at risk of being, harmed.

Honour or Faith-based Abuse (including FGM and forced marriage)
Honour or faith-based abuse covers incidents and crimes committed to protect or defend the honour of a family or community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. It often involves a wider network of family or community pressure and can include multiple perpetrators; staff should be aware of these dynamics when deciding what safeguarding action to take. All forms of honour or faith-based abuse are abuse, regardless of motivation, and should be handled and escalated as such.

If staff have a concern that a child might be at risk of, or has already suffered, honour or faith-based abuse, they should speak to the DSL, who will activate local safeguarding procedures as appropriate.

Female genital mutilation (FGM)
FGM comprises all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs, for non-medical reasons. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. FGM typically takes place between birth and around 15 years old, though most cases occur between the ages of 5 and 12.

Under section 5B of the Female Genital Mutilation Act 2003, teachers (including anyone employed or engaged to carry out teaching work) have a mandatory duty to personally report to the police any case where they discover that an act of FGM appears to have been carried out on a girl under 18. It will be rare for teachers to see visual evidence, and they should not examine pupils. Unless there is good reason not to, teachers should also discuss the case with the DSL and involve children's social care.

All staff are made aware of the indicators of FGM and are asked to undertake training. Any concern should be reported immediately to the DSL, who will activate local safeguarding procedures, using national and local protocols for multi-agency liaison with police and children's social care.

Risk factors for FGM can include:

- low level of integration into UK society

- a mother or sister who has undergone FGM
- being withdrawn from PSHE
- a visiting female elder from the family's country of origin
- being taken on a long holiday to the country of origin
- talk of a "special" procedure to become a woman
- Indications that FGM may have already taken place can include:
- difficulty walking, sitting or standing
- spending longer than usual in the bathroom, or having difficulty urinating
- spending long periods away from the classroom with bladder or menstrual problems
- prolonged or repeated absences, especially alongside noticeable behaviour changes (e.g. withdrawal or low mood) on return
- reluctance to undergo normal medical examinations
- confiding in a professional without being explicit, due to embarrassment or fear
- talking about pain or discomfort between her legs
- Further information on when and how to make a report is available in the mandatory reporting of FGM: procedural information.

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 a looked after child, sometimes called a child in care. This includes children living with foster parents, in a residential children's home, or in residential settings such as schools or secure units. The most common reason for a child becoming looked after is abuse and/or neglect.

Our schools have appointed a designated teacher for looked after children, who has responsibilities under section 2E of the Academies Act 2010 for promoting the educational achievement of children adopted from state care outside England and Wales. The designated teacher must be appropriately trained and qualified, and should have information about the child's care arrangements and the authority delegated to their carer. The DSL should hold 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 them safe. Agencies working with LAC and PLAC should work together and take prompt action where needed, as this is a particularly vulnerable group.

Before excluding, whether for a fixed term or permanently, a vulnerable pupil, a child with additional needs, or a pupil with social care involvement, including those subject to a section 47 child protection plan or child in need plan, or with previous child protection concerns, we carry out an informed (multi-agency, where relevant) risk assessment first. Where an exclusion would send a pupil home, schools should speak to their named social worker to assess any risk, and can contact the Area Inclusion Partnership for support. See Section 3 of the DfE's School suspensions and permanent exclusions guidance. Where a looked after child is at risk of exclusion, the school will notify the Virtual School. Following a one-off serious incident resulting in an immediate decision to permanently exclude, the risk assessment must still be completed before the governing board meets.

Mental Health, Modern Slavery, and the Impact of Abuse

Mental health
The Trust ensures schools have clear systems for identifying possible mental health problems, including routes to escalate and clear referral and accountability arrangements. Each Trust school has a senior mental health lead, who is part of or supported by the senior leadership team.

Mental health problems can, in some cases, develop into safeguarding concerns, including self-harm, suicidal ideation, or risk of suicide, and can also indicate that a child has suffered or is at risk of abuse, neglect or exploitation. Only appropriately trained professionals should attempt to diagnose a mental health problem, but staff are well placed to observe children day-to-day and notice potential warning signs, including:

- significant changes in behaviour
- ongoing difficulty sleeping
- withdrawing from social situations
- losing interest in things they usually enjoy
- physical signs of self-harm or self-neglect

Not every child showing these signs is suicidal or has a mental health concern, but identifying them allows staff to offer support and early intervention. Any intervention offered should be evidenced as safe, effective, and appropriate to the child's needs and phase of education.

If staff have a mental health concern that is also a safeguarding concern, they should follow the child protection policy and speak to the DSL or deputy. If a child is in danger, staff should call 999 or arrange for them to be taken to A&E immediately. For urgent but non-emergency mental health help, staff can contact NHS 111 (online or by phone, selecting the mental health option).

Modern slavery and the National Referral Mechanism
Modern slavery encompasses exploitation in many forms, including sexual exploitation, criminal or financial exploitation, human trafficking, slavery, servitude, forced or compulsory labour, forced criminality, and the removal of organs. The National Referral Mechanism (NRM) is the UK system for supporting potential victims of exploitation and modern slavery; children referred into the NRM in England and Wales may also access an Independent Child Trafficking Guardian, who provides advocacy and supports their recovery.

Impact of abuse
The impact of child abuse should never be underestimated. Many children go on to lead healthy, happy and productive lives, though most adult survivors say some emotional scars remain, however well hidden. For some, full recovery isn't possible, and the rest of their childhood and adulthood may be affected by anxiety, depression, self-harm, eating disorders, alcohol or substance misuse, unequal or destructive relationships, and long-term medical or psychiatric difficulties.

Preventing Radicalisation and Channel
Protecting children from the risk of radicalisation into terrorism is part of schools' wider safeguarding duties, similar in nature to protecting children from other forms of harm. It is possible to intervene during the process of radicalisation to prevent a vulnerable person being drawn further in.

Extremism means 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 means the use or threat of serious violence against a person or property, designed to influence government or intimidate the public, for a political, religious, racial or ideological cause.

There is no single profile for a child susceptible to radicalisation, but certain background factors, combined with specific influences such as family, friends or online contact, and specific unmet needs, can increase vulnerability. The internet and social media are now a major factor in the radicalisation of young people. As with other safeguarding risks, staff should stay alert to changes in a child's behaviour that could indicate they need help or protection, and should use their judgement, acting proportionately, which may include a referral to the Channel programme.

Since 1 July 2015, all schools have had a duty under section 26 of the Counter-Terrorism and Security Act 2015 to have "due regard to the need to prevent people from becoming terrorists or supporting terrorism." This is known as the Prevent duty; the DfE has published supporting advice for schools on managing this risk. All staff are made aware of the indicators of radicalisation.

Signs to be aware of
According to Educate Against Hate and the NSPCC, signs that a child may be being radicalised can

include:

- refusing 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, or rejecting activities they used to enjoy
- converting to a new religion or isolating themselves from family and friends
- talking as if from a scripted speech, or an unwillingness to discuss their views
- a sudden disrespectful attitude towards others, or increased anger
- increased secretiveness, especially around internet use
- expressing sympathy for extremist ideologies or groups, or justifying their actions
- accessing extremist material online, or possessing extremist literature
- being in contact with extremist recruiters, or joining or seeking to join extremist organisations

Children at risk of radicalisation may have low self-esteem or be victims of bullying or discrimination. Many of these signs can also be part of normal child development, so staff should trust their instincts rather than wait for certainty, and should report any concerns 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.

All Trust schools complete a Prevent Risk Assessment, updated at least annually.

Channel

Channel is a voluntary, confidential support programme that provides early support to people identified as susceptible to being drawn into terrorism. Prevent referrals are assessed and may be passed to a multi-agency Channel panel, which considers whether the individual is at risk and what support they need; a school representative may be asked to attend to help with this assessment. Support through the programme requires the individual's consent. If new information comes to light while a referral is being assessed, staff should also pass this to the police.

Private Fostering

Private fostering is when a child under 16 (under 18 if disabled) is cared for and accommodated by someone who isn't a parent, a person with parental responsibility, or a relative, in that person's own home. It doesn't apply if the arrangement lasts under 28 days and isn't intended to continue longer. These arrangements can come to staff's attention through the normal course of interacting with, and teaching, children.

Most privately fostered children are appropriately cared for, but they're a potentially vulnerable group that should be monitored by the local authority, particularly where the child has come from another country; some are affected by abuse, neglect, trafficking, child sexual exploitation, or modern slavery.

Where an arrangement comes to a school's attention and the school isn't involved in it, we notify the local authority so they can check it's suitable and safe. Where a school is involved, even indirectly, in arranging private fostering, it must notify the local authority as soon as possible after the arrangement is made. Notifications must be made in writing and contain the information specified in Schedule 1 of the Children (Private Arrangements for Fostering) Regulations 2005. Comprehensive guidance is available in Children Act 1989: private fostering.

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 arising from abuse, neglect, exploitation or complex family circumstances. Experiences of adversity and trauma can leave a child vulnerable to further harm, and educationally disadvantaged through barriers to attendance, learning, behaviour and mental health

Local authorities should share the fact that a child has a social worker; the DSL holds and uses this information, as a matter of routine, to support decisions in the best interests of the child's safety, welfare and educational outcomes. Clear powers exist to share this information under existing duties on both local authorities and schools to safeguard children's welfare.

Where a child needs a social worker, this informs decisions about safeguarding, for example responding to unauthorised absence or missing education where there are known safeguarding risks, and about promoting welfare, for example providing pastoral or academic support alongside statutory services.

In September 2024, the Virtual School Head role was extended to include a non-statutory responsibility to promote the educational achievement of children in kinship care; further detail is in Promoting the education of children with a social worker and children in kinship care arrangements.

Virtual School Heads also hold a non-statutory responsibility for the strategic oversight of attendance, attainment and progress for children with a social worker, working with local authorities to set and report on ambitious attendance targets for this group. Where a pupil with a social worker has an attendance concern, our schools will consider whether this should be raised with the Virtual School Head as part of our wider attendance procedures.

Racist and Homophobic Incidents
Our schools value the individuality of all pupils and are committed to giving every child the opportunity to achieve the highest standards. Within this ethos, we do not tolerate bullying or harassment of any kind. Our Race Equality Policy reflects the duties on schools under the Equality Act 2010, and we have regard to the Department for Education's guidance on preventing and tackling bullying, including bullying related to sexual orientation, gender reassignment, disability, race and religion.

Schools follow their local safeguarding partners' guidance on reporting and recording all racist and homophobic incidents, using national and local protocols for multi-agency liaison with the police and children's social care.

All forms of honour-based abuse are abuse, regardless of motivation, and will be handled and escalated as such.

Safeguarding in Sport, Physical Education and Enrichment Activities
Sport, physical education and enrichment activities offer valuable opportunities for pupils, but also require robust safeguarding arrangements. Schools will ensure appropriate supervision ratios, effective risk assessments, safer recruitment and vetting for adults working with pupils, safe use of changing facilities, clear reporting procedures for concerns or disclosures, and appropriate professional boundaries and conduct.

These responsibilities apply equally to curriculum activities, extra-curricular provision, educational visits, residential activities, competitions, and activities delivered by external providers.

Keeping Children Safe in Education confirms that schools can lawfully group pupils by biological sex for sport where physical differences create a safety or fairness issue, and that for some sports this must always apply, with no exceptions. Where single-sex grouping is required for safety, it will always apply; where a pupil raises a request about how they participate in sport in connection with their gender identity, this will be considered in line with the Trust's approach to requests for support with social transition.

Any concern arising during sporting or enrichment activities will be managed in line with this policy and local safeguarding procedures.

Serious Violence
Serious violence is a continuing safeguarding concern. It may involve physical assault, or carrying, threatening with, or using weapons, often in the context of peer conflict or bullying, and can also be linked to criminal exploitation. Staff should report any concern about a child carrying or using a weapon, or expressing intent to, to the DSL (or a deputy), who will assess the risk to that pupil and others in the school, taking wider information into account, and act accordingly, putting in place a safety and support plan, and considering action to de-escalate peer conflict, depending on the risk.

Schools play a key role in protecting children from violence, both victims and those at risk of, or involved in,

committing it, who may also be victims themselves. Staff should be alert to signs a child may be at risk of, or involved in, serious violence; this risk is higher for children with disrupted education, such as suspensions, permanent exclusions, or time in alternative provision, or a history of offending. Schools should also stay alert to when children may be at highest risk during the school day, for example immediately after school. Further information on indicators, risk factors, and protective action is in KCSIE Annex A.

Early, evidence-based support is vital, both for those considered at risk and at critical points when concerns emerge. This includes access to trusted adults, social and emotional skill-building, and, where available, targeted interventions such as mentoring or therapeutic support; practical guidance is available from the Youth Endowment Fund, the "what works" centre for preventing violence.

Sexual Violence/Sexual Harassment and Harmful Sexual Behaviour (HSB)
Harmful sexual behaviour, sexual violence and sexual harassment can occur between children of any age and sex, whether online, face-to-face, in a single incident, or as a pattern. They exist on a continuum, and left unaddressed can escalate. All victims are reassured they are being taken seriously and kept safe; no victim should ever be made to feel they are creating a problem or should be ashamed for reporting.

We hold a zero-tolerance approach: sexual violence and sexual harassment are never acceptable and will not be dismissed as "banter," "just having a laugh," "part of growing up," or "boys being boys." Tolerating such behaviour risks normalising it and creates a culture where children don't come forward.

Girls are statistically more likely to be victims and boys more likely to be perpetrators, though any child can be either. Children with SEND are three times more likely to be abused than their peers.

All staff are trained to manage a report appropriately, in line with local safeguarding partner guidance.

What the terms mean
Sexual violence refers to child-on-child sexual violence and the offences below under the Sexual Offences Act 2003:

- Rape: intentional penetration of the vagina, anus, or mouth without consent
- Assault by penetration: intentional sexual penetration of the vagina or anus, by a body part or object, without consent
- Sexual assault: intentional sexual touching without consent (this covers a wide range of behaviour, from a single unwanted touch upward)
- Causing someone to engage in sexual activity without consent: including forcing someone to strip, touch themselves, or engage in sexual activity with a third party

A child under 13 can never consent to sexual activity; the age of consent is 16; sexual intercourse without consent is rape. Full legal definitions and further guidance on consent: Rape Crisis England & Wales.

Sexual harassment means unwanted conduct of a sexual nature, online or offline, that violates a child's dignity or creates a hostile, offensive, or sexualised environment. Examples include sexual comments or "jokes," unwanted physical contact, displaying sexual images, and online sexual harassment, including sharing of nudes/semi-nudes (see UKCIS guidance).

HSB is the umbrella term for sexual behaviour that is developmentally inappropriate, problematic, abusive, or violent. Behaviour may be considered harmful where there's a significant age or developmental gap between the children involved, typically two or more years, or where one child is pre-pubescent and the other is not, though a younger child can abuse an older one where a power imbalance exists, for example due to disability or size. Our DSLs are trained to assess HSB and understand that children who display it have often experienced abuse or trauma themselves, and need appropriate support alongside any response.

Responding to a report
Children often don't disclose verbally. Signs of distress, a friend's report, or an overheard conversation may

be the first indication. Staff should act immediately rather than waiting to be told, and should never assume someone else is handling it. If in doubt, they should speak to the DSL (or deputy) straightaway.

Staff should follow this good practice when managing a report:

- Where possible, have two staff present, ideally including the DSL/deputy
- Never promise confidentiality; the victim should understand it's likely to be shared further, and only with those who need to know
- Recognise the significance of being chosen as a confidant, and that an initial disclosure may not reflect the full extent of what happened, as trauma can affect memory. Some children face additional barriers to disclosure, for example due to disability, ethnicity, or sexual orientation, so staff should be especially attentive with these groups
- Listen without judgement, use the child's language, and ask only open questions such as where, when and what, avoiding leading questions, though staff can ask if the child has been harmed and how
- Make a detailed written record as soon as possible after the conversation, recording only what the child said, without interpretation. These notes may be needed for statutory assessments or criminal investigations
- Where there's an online element, avoid viewing or forwarding any illegal images, and confiscate the device for the police if needed: see searching, screening and confiscation guidance
- Inform the DSL/deputy as soon as practically possible if they weren't present

This applies equally to incidents that happened off-site or online, and to reports involving pupils from different schools. Appropriate information sharing and multi-agency working will be especially important in those cases.

Confidentiality and anonymity: Staff should never promise confidentiality when receiving a report. If a victim asks that nothing be shared, staff may still lawfully share information where it's in the public interest, for example to protect a child from harm; they should pass the concern to the DSL, who will follow KCSIE guidance. Where a case enters the criminal justice system, schools should take reasonable steps to protect all children's anonymity, including from the risk posed by social media.

Risk and needs assessment

Following a report of sexual violence, the DSL (or deputy) carries out an immediate risk and needs assessment; for sexual harassment, this is considered case by case. The assessment considers:

- the victim's safety and support needs, and potential other victims
- the alleged perpetrator(s)
- the wider school community and any protective action needed
- the location and time of the incident, with steps to improve safety there

Assessments are recorded, reviewed regularly, and used to inform ongoing decisions. They don't replace expert assessment from social workers or specialist services, which should inform and update the school's own view.

Further considerations include: the victim's wishes, balanced against the duty to protect other children; whether a crime may have been committed; the ages, developmental stages, and any power imbalance between those involved; whether the incident is a one-off or a pattern, since sexual abuse can accompany other forms of abuse; that sexual violence and harassment can occur within intimate relationships between children; and links to CSE/CCE. As always, we act in the best interests of the child and follow KCSIE's general safeguarding principles, recording all decisions and rationale in writing.

Supporting the victim

The victim's needs and wishes are paramount. Where possible, they should continue their normal routine; the goal is for school to remain a safe, ordinary space for them, not for the response to isolate them from supportive peers. If they need space, schools should provide a room to withdraw to; if lessons alongside the alleged perpetrator become difficult, schools should consider adjustments. Any decision to move to a different educational setting should be at the victim's request, following discussion with parents/carers, with

the child protection file and any ongoing support needs transferred to the new school.

Schools should offer a trusted adult of the victim's choosing to talk to, should be alert to the risk of bullying or harassment following a report, including via social media and on school transport, and should take reasonable steps to protect all children involved.

Supporting the alleged perpetrator
The same effective-safeguarding approach applies to alleged perpetrators. A child who has abused another may have been abused themselves, or the incident may point to a wider issue in the school's culture. As a child, they're entitled to a high level of support to help them understand and address their behaviour, alongside proportionate disciplinary action considered case by case; the two are not mutually exclusive and can happen together, but staff should be clear about which is which, since each is governed by different rules.

Discipline: Teachers can discipline pupils whose conduct falls below expected standards, and can do so while police or children's social care investigations are ongoing. The school can reach its own view on the balance of probabilities without waiting for other outcomes, provided this wouldn't prejudice an investigation or prosecution. See DfE behaviour and exclusions guidance.

Working with parents and carers
We generally involve both the victim's and the alleged perpetrator's parents or carers following a report of sexual violence, considered case by case for sexual harassment, unless doing so would place a child at additional risk. It's good practice to meet the victim's parents with the victim present to discuss safeguarding arrangements and support, and separately to meet the alleged perpetrator's parents to explain any measures being put in place and why. The DSL (or deputy) typically leads these conversations. Details of organisations that support parents are provided in Annex A of Keeping Children Safe in Education; schools should consider signposting parents and carers to this support.

Safeguarding other children
Children who witness sexual violence, especially rape or assault by penetration, may also need support. Following any report, schools should be alert to children taking sides, to the role social media can play, and to the vulnerability of school transport; the risk assessment should consider protective steps here too.

Our schools keep policies, processes, and curriculum under regular review. Patterns in reports can point to wider environmental or cultural issues worth addressing directly.

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

Statutory Children's Social Care Assessments and Services
Where a child is suffering, or is likely to suffer, harm, a referral to local authority children's social care, and the police where appropriate, should be made immediately, following the local referral process (see When to Call the Police: guidance for schools and colleges).

Local authority assessments should also consider harm occurring outside the home, so schools should provide as much information as possible as part of the referral to support a contextual approach. More information is available at Contextual Safeguarding.

Children in need
A child in need, as defined under the Children Act 1989, is a child unlikely to achieve or maintain a reasonable level of health or development, or whose health or development is likely to be significantly or further impaired, without the provision of services, or a child who is disabled. Local authorities must provide services for children in need to safeguard and promote their welfare, and children in need may be assessed under section 17 of the Act. Local authorities, with their safeguarding partners, publish local protocols for these assessments, including who can act as lead practitioner, which is not limited to social workers.

Children suffering or likely to suffer significant harm
Local authorities have a duty under section 47 of the Children Act 1989 to make enquiries where they have reasonable cause to suspect a child is suffering, or is likely to suffer, significant harm, covering all forms of abuse, neglect and exploitation, so they can decide what action is needed to safeguard the child.

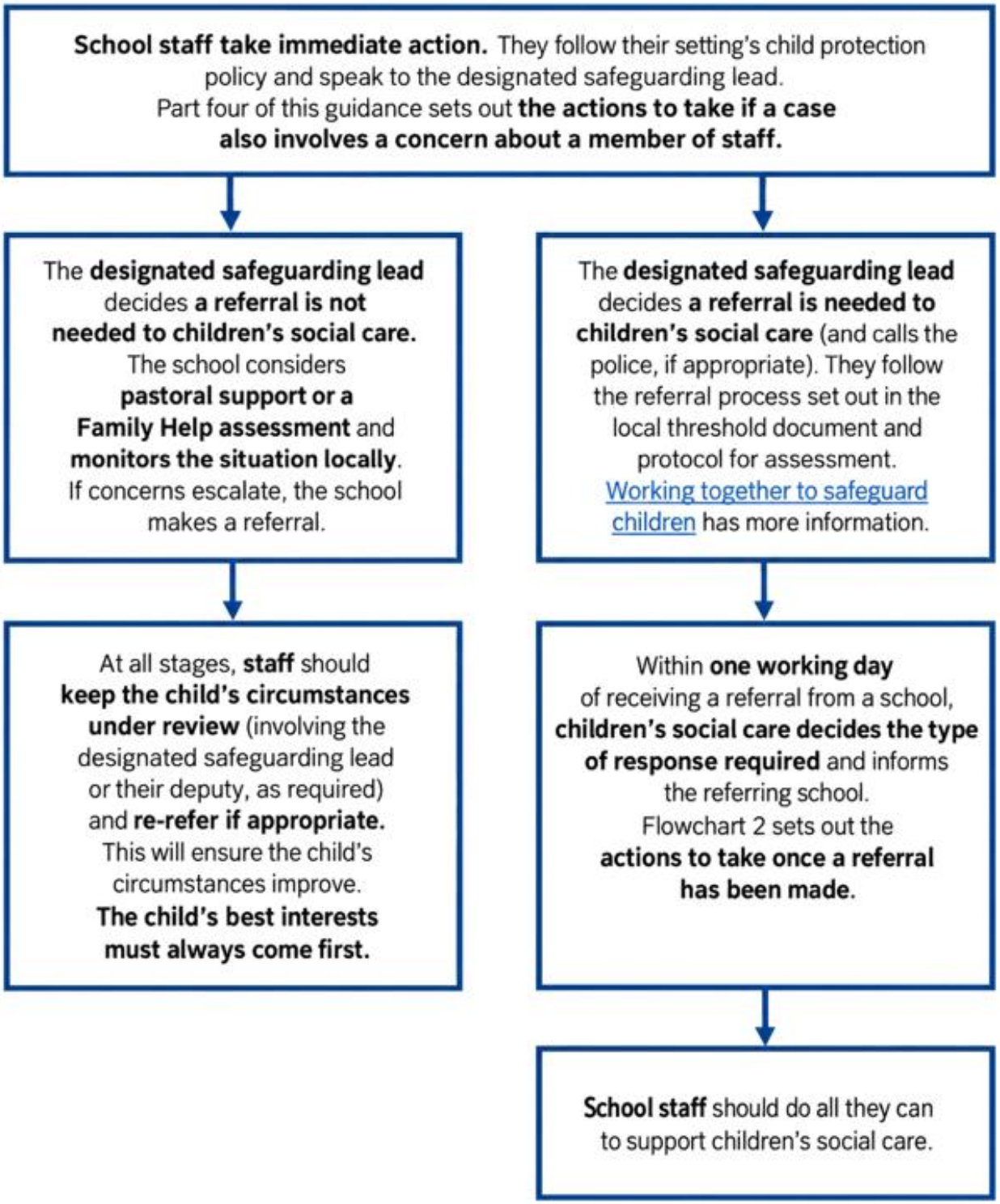
What the local authority will do
Within one working day of a referral, a social worker should acknowledge receipt to the referrer and decide on next steps, including whether:

- the child needs immediate protection and urgent action
- the child and family need services, and what type
- the child should be assessed as a child in need under section 17
- there is reasonable cause to suspect significant harm, requiring section 47 enquiries and assessment
- further specialist assessment is needed to inform next steps

The referrer should follow up if this information isn't forthcoming. If a statutory assessment goes ahead, staff should support it fully, with help from the DSL (or deputy) as needed. If the child's situation doesn't appear to be improving after a referral, the referrer should consider local escalation procedures to ensure their concerns are addressed.

Young Carers
Our schools stay alert to the needs of young carers, recognising that caring responsibilities can affect their attendance, attainment, behaviour and wellbeing. Early identification is essential to ensure young carers get the right support at the right time, from the appropriate services, including external partners or local authority and health services.

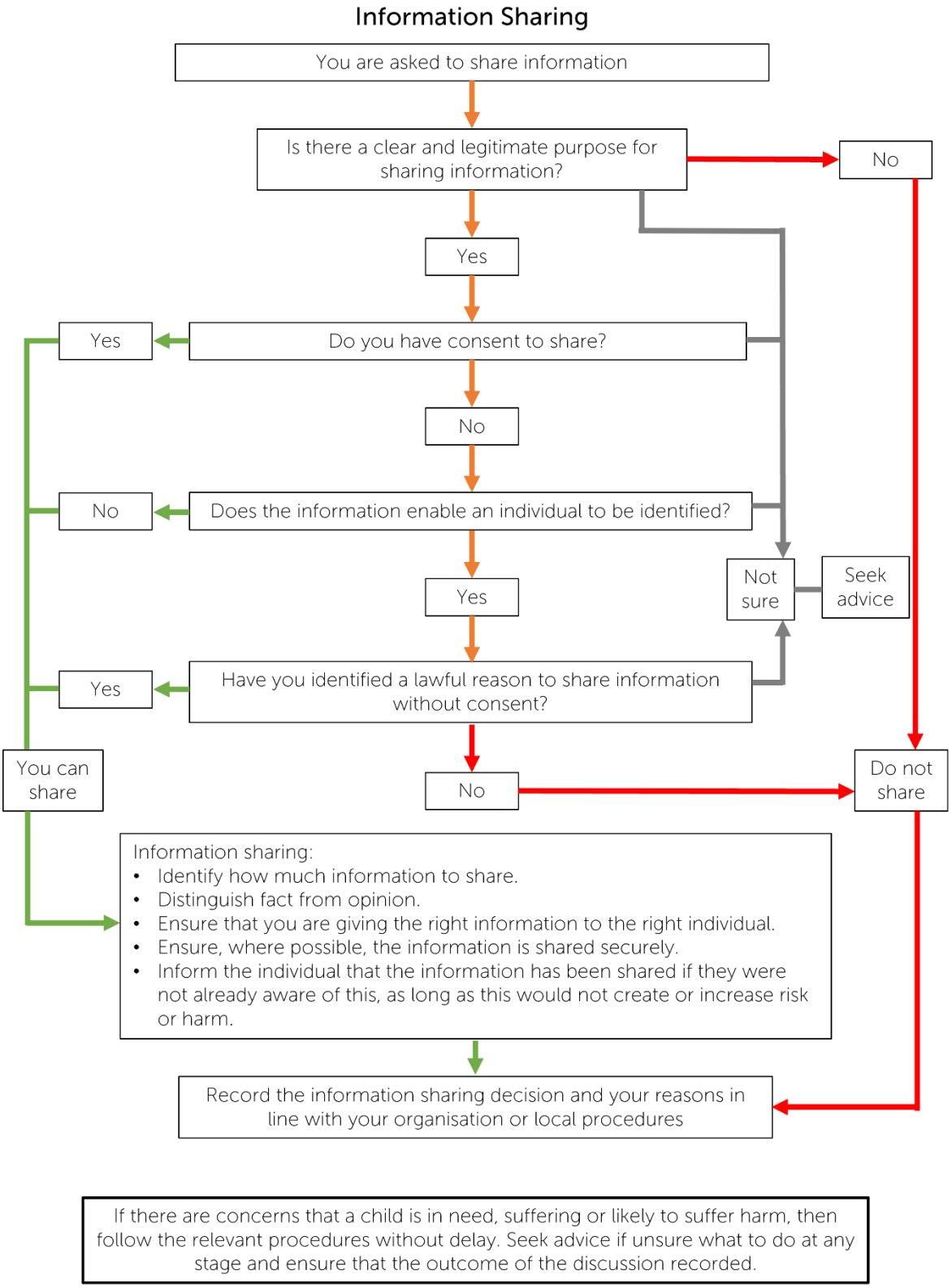
Appendix 4 – Actions where there are concerns about a child flowchart



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

