



SAFEGUARDING AND CHILD PROTECTION POLICY FOR TRUST SHARED SERVICES

This policy was approved:	Autumn 2026
This policy will be reviewed:	Autumn 2027
Member of staff with responsibility for leading review:	Director of Inclusion

Significant Changes

This policy has been completely rewritten to reflect the significant changes within KCSIE 2026.

10.2 KCSIE 2026 compliance updates reflected in this policy:

- States that all staff must read Part One of KCSIE in full and removes reliance on the former condensed Annex A approach;
- Distinguishes community-based early help from the targeted early help level of Family Help, and explains how this sits alongside section 17 child in need and section 47 child protection referrals;
- Updates terminology to "making or sharing nudes and semi-nudes", including images created, taken by another person, digitally altered, or generated using AI;
- Adds child-to-parent or caregiver abuse to the abuse definitions and staff awareness requirements;
- Strengthens child-on-child abuse, harmful sexual behaviour, serious violence, weapons, Family Help referrals, and support for both victims and alleged perpetrators;
- Updates online safety to include generative AI, mobile phone-free expectations, annual filtering and monitoring reviews, and information security;
- Updates expectations relating to sport, toilets, changing rooms, showers, residential accommodation and requests for support with social transition;
- Strengthens safeguards for children absent from education, young carers, pupils in alternative provision, children with SEND, children with medical conditions, children who are lesbian, gay or bisexual, and children who are questioning their gender;
- Updates safer recruitment to reflect trainee teachers, volunteers, visitors, work experience, DBS checks, regulated activity, the removal of the previous supervision exemption, and duties to refer concerns about adults, including volunteers; and
- Clarifies management of allegations and low-level concerns involving staff, supply staff, trainee teachers, volunteers, contractors and external organisations using academy premises.

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Contents

1. Safeguarding statement.....	11
3. Trust wide safeguarding principles	12
4. Governance and accountability.....	13
4.1 Trust Board and Local Governing Body	13
4.2 Assurance and reporting.....	14
5. Roles and responsibilities	14
5.1 Headteacher	14
5.2 Designated Safeguarding Lead	15
5.3 Deputy Designated Safeguarding Leads	15
5.4 All staff.....	16
5.5 SENCo, Designated Teacher, attendance and mental health leads.....	16
5.6 Visitors, volunteers, supply staff, contractors and trainee teachers	17
6. Training, induction and supervision	17
7. Prevention and safeguarding through the curriculum	17
8. Procedures for concerns about a child	18
8.1 Immediate action	18
8.2 Responding to a disclosure	19
8.3 DSL decision-making	19
8.4 Community-based early help, Family Help and statutory intervention	19
8.5 Escalation and professional challenge.....	20
9. Information sharing, confidentiality and records.....	20
10. Children who may be at greater risk of harm	21
1. Appendix A. Categories of abuse.....	36
2. 36	
3. Appendix B. Child-on-child sexual harassment and sexual violence procedure	37
4. Appendix C. Alternative provision safeguarding expectations	39
5. Appendix D. Training expectations	39
6. Appendix E. Allegations and low-level concerns about adults	40
7. 40	
8. Appendix F. Reference documents	41
9. 41	

10. Appendix G. Local safeguarding contacts	42
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1. Safeguarding statement

Safeguarding and promoting the welfare of children is everyone's responsibility. In this policy, children means everyone under the age of 18. Everyone who comes into contact with children and their families has a role to play in identifying concerns, sharing information and taking prompt action so that children receive the right help at the right time.

This policy relates to Anglian Learning staff directly employed to fulfil Trust-wide responsibilities. It is reviewed under the direction of the CEO annually.

Anglian Learning and each academy within the Trust are committed to providing help and support to meet the needs of children as soon as problems emerge; protecting children from maltreatment, whether that harm occurs 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 safe and effective care; and taking action to enable all children to have the best outcomes.

Our approach is child centred. All staff, governors and trustees must consider, at all times, what is in the best interests of the child. Safeguarding is not limited to compliance activity; it is an active culture of vigilance, relational care, professional curiosity and timely action. Staff must maintain an attitude of "it could happen here" and must never assume that a colleague or another professional will act on information that may be critical to keeping a child safe.

This policy is underpinned by Anglian Learning's commitment to Belonging by Design. Belonging is a protective factor. It does not remove the need for statutory safeguarding action; rather, it strengthens the conditions in which children are known, heard, included and supported before risk escalates.

2. Purpose, scope and legal framework

This policy sets out how Anglian Learning and each academy discharge their statutory and moral responsibilities to safeguard and promote the welfare of children. It applies to all pupils on roll and to all children who participate in academy activities, including off-site provision, alternative provision, extended school activity, wraparound care, trips, residential visits and activities delivered by external providers on academy premises.

Each academy in the Trust is expected to have its own Safeguarding and Child Protection Policy annually updated in line with the DfE's 'Keeping Children Safe in Education'. Led by a member of the Executive Leadership Team, the Safeguarding Leadership Group will review the draft academy Policy and make recommendations for any additions or changes to match statutory requirements and Trust expectations. Each academy is expected to personalise the Policy to match the academy's context and to implement it accordingly. Shared Services trust staff, and staff from individual academies who work in other schools and academies, will ensure that they know the procedures for recording and reporting concerns in each academy. They will adhere to these if they have any concerns about pupils in the academy in which they are working.

The policy applies to all adults working in or on behalf of Anglian Learning, whether paid or unpaid. This includes trustees, governors, employees, supply staff, trainee teachers, volunteers, contractors, agency staff, peripatetic staff, visitors and organisations using academy premises for activities involving children.

In this policy, "must" refers to a legal duty or mandatory Trust requirement. "Should" refers to expected practice which must be followed unless there is a clear, recorded and defensible reason for taking a different course of action.

This policy should be read alongside the Anglian Learning's overarching Attendance Policy, Online Safety Policy, Staff Code of Conduct, Low-Level Concerns Policy, Whistleblowing Policy, Resourcing Policy, Data Protection Policy, and local safeguarding partnership procedures. Where appropriate, it should also be read in conjunction with individual academy policies relating to Behaviour and Relationships, Anti bullying, SEND, PSHE and RSE and Educational Trips and Visits.

The principal statutory and guidance framework includes:

- Keeping Children Safe in Education 2026: statutory guidance for schools and colleges, effective from 1 September 2026;
- Working Together to Safeguard Children and local safeguarding partner arrangements;
- Education Act 2002, including sections 157 and 175 as applicable to academies and schools;
- Children Act 1989 and Children Act 2004;
- Equality Act 2010 and the Public Sector Equality Duty;
- Human Rights Act 1998;
- Data Protection Act 2018, UK GDPR and the Data (Use and Access) Act 2025;
- Prevent duty and associated statutory guidance;
- Crime and Policing Act 2026 changes to regulated activity and volunteer supervision;
- School Premises (England) Regulations 2012 and Education (Independent School Standards) Regulations 2014, where applicable;
- Early Years Foundation Stage statutory framework where children aged 0 to 5 attend school-based nursery or reception provision; and
- Local authority threshold documents and local multi-agency safeguarding procedures.

3. Trust wide safeguarding principles

Safeguarding must be embedded across academy systems, policies and practice. Safeguarding and child protection must be at the forefront of policy development, behaviour systems, curriculum planning, attendance work, inclusion practice, online safety, recruitment, pastoral care, SEND provision and site management.

Systems must be transparent, clear and easy for staff, children, parents and carers to understand. Children must know how to report concerns, including concerns about abuse, harassment, violence, bullying, online harm or unsafe adults. Reporting routes must be well promoted, accessible, age appropriate and responsive. Children must be reassured that they will be taken seriously, supported and kept safe.

Anglian Learning must take account of children's wishes and feelings when deciding what action to take and what services to provide. This does not mean that a child's wishes determine the safeguarding response. Decisions must be based on the child's welfare, safety, rights, needs and best interests, as well as the safety and rights of other children.

Safeguarding practice will be inclusive and non-discriminatory. Anglian Learning will have due regard to equality duties and will be particularly alert to children who may experience additional vulnerability or barriers to receiving help because of disability, SEND, protected characteristics or personal circumstances.

Anglian Learning will promote a culture of respectful relationships and zero tolerance of abuse. Zero tolerance means that abuse, harassment, racism, misogyny, misandry, homophobia, biphobia, transphobia, faith-based prejudice, sexual harassment, sexual violence, bullying and derogatory or violent behaviour are never normalised, minimised or dismissed as banter, part of growing up or inevitable peer conflict. Responses must be proportionate, evidence-informed, trauma-informed where relevant, restorative where appropriate, and always rooted in safeguarding and accountability.

4. Governance and accountability

4.1 Trust Board and Local Governing Body

The Anglian Learning Trust Board is the proprietor for academy safeguarding purposes. The Trust Board and each Local Governing Body must ensure that policies, procedures, training and assurance arrangements comply with the law, statutory guidance, local safeguarding arrangements and Trust expectations. The Trust Board retains strategic oversight, and the Local Governing Body provides academy-level scrutiny and challenge. These arrangements apply until such a time as LGBs are replaced by revised governance arrangements, at which point this policy will be updated to reflect those changes.

The Trust Board and Local Governing Body must ensure that:

- Safeguarding and child protection arrangements are effective, understood and implemented;
- There is an effective child protection policy, reviewed at least annually and updated as risks, guidance and lessons learned evolve. This will be shared with academies and adapted locally to reflect specific school contexts.
- There is a named safeguarding trustee or other designated governance lead who has appropriate training and regularly monitors safeguarding practice;
- The nominated Trustee for safeguarding is: Annabel Curwen
- All trustees and governors receive safeguarding and online safety training at induction and regular updates thereafter so that they can provide effective strategic oversight;
- There is an appropriately senior trust-wide Designated Safeguarding Lead with the authority, time, training, resources and support needed to carry out the role;
- Safeguarding and child protection arrangements in each academy are subject to annual audit, with active involvement of academy leaders and LGB's.

- Ensure an annual report on safeguarding audit outcomes is made to the Board of Trustees, highlighting both strengths and any weaknesses with actions identified.
- Each academy has an appropriately senior Designated Safeguarding Lead with the authority, time, training, resources and support needed to carry out the role;
- Each academy has trained Deputy Designated Safeguarding Leads and robust DSL cover arrangements for absence, illness, leave or other unavailability;
- Safeguarding concerns can be received, monitored and acted upon without delay, including through a confidential shared safeguarding mailbox or equivalent secure system where appropriate;
- Filtering and monitoring arrangements are appropriate, effective, reviewed at least annually and not unreasonably restrictive of learning;
- Safeguarding weaknesses identified through audit, inspection, peer review, complaints, incidents or case review are addressed without delay;
- Safer recruitment arrangements, the single central record and checks for all relevant adults are compliant and regularly quality assured;
- Children's wishes and feelings, equality duties and the needs of vulnerable groups are considered in safeguarding decision-making; and
- Where premises are hired or used by external organisations, safeguarding expectations are written into the agreement, and non-compliance can result in termination of use.

4.2 Assurance and reporting

Anglian Learning and Local Governing Bodies must ensure that their academies maintain safeguarding records, training records, filtering and monitoring review records, child protection file transfer records, safer recruitment records and evidence of safeguarding quality assurance. The Headteacher and DSL will report to the Local Governing Body in line with the Trust safeguarding framework. The Trust Safeguarding Lead will provide strategic assurance to executive leaders, trustees and relevant committees.

Safeguarding assurance should include regular checks of filtering and monitoring evidence, single central record compliance, safer recruitment sampling, alternative provision quality assurance, child protection file transfer compliance, staff and governor training completion, low-level concern patterns, referrals and outcomes, child-on-child abuse trends, attendance safeguarding data, pupil voice and learning from incidents, complaints and case reviews.

5. Roles and responsibilities

5.1 Headteacher

The headteacher is responsible for ensuring that their academy safeguarding policy and associated procedures are fully implemented. The headteacher must ensure that sufficient time, staffing, training, supervision, systems and resources are available for safeguarding to operate effectively. The headteacher is responsible for sustaining a culture in which staff are vigilant, children are heard,

concerns are acted upon, and adults understand that safeguarding is a core professional responsibility.

The headteacher will ensure that all staff know who the DSL and Deputy DSLs are, how to contact them, how to record a concern, how to escalate a concern and what to do if no DSL is immediately available. The headteacher will ensure that visitors, supply staff, trainee teachers, contractors and volunteers receive safeguarding information proportionate to their role and contact with children.

5.2 Designated Safeguarding Lead

The DSL is the senior member of staff with lead responsibility for safeguarding and child protection, including online safety and understanding the academy's filtering and monitoring systems and processes. The DSL role must be explicit in the postholder's job description. The DSL must have the status and authority to act, challenge and influence safeguarding practice across the academy.

The DSL will:

- Act as the first point of contact for safeguarding and child protection concerns;
- Manage referrals to local authority children's social care, the police, Channel, the LADO and other agencies as appropriate;
- Support staff to identify concerns, record accurately, share information and take timely action;
- Liaise with the headteacher, SENCo, Designated Teacher, attendance lead, pastoral leads, mental health lead and external agencies to ensure children receive coordinated support;
- Lead or support Family Help activity where appropriate and keep cases under review where concerns do not meet statutory thresholds;
- Ensure that child protection files are accurate, secure, chronologically clear and transferred as soon as possible when a child moves setting, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term; secure transit and confirmation of receipt must be obtained;
- Ensure relevant safeguarding information is shared with staff who need it to protect and support the child, while maintaining appropriate confidentiality;
- Promote staff understanding of children who may be at greater risk of harm, including those identified in Section 10 of this policy;
- Ensure pupil voice and the child's lived experience inform safeguarding action;
- Ensure safeguarding practice is informed by local thresholds, local safeguarding partnership procedures and Trust requirements; and
- Contribute to safeguarding audits, reviews, reports, training and lessons learned.

5.3 Deputy Designated Safeguarding Leads

Deputy DSLs must be trained to the same standard as the DSL. They will support the DSL, provide cover, act on concerns without delay and ensure continuity of safeguarding responsibilities. The presence of deputy DSLs does not remove the DSL's lead responsibility, but any deputy acting in the DSL's absence must have the authority and knowledge to make safeguarding decisions.

5.4 All staff

All staff, including those who do not work directly with children, must receive, read and understand Part One of KCSIE in full. Anglian Learning will ensure staff are supported to understand and discharge their safeguarding responsibilities. All staff must receive safeguarding and child protection training, including online safety, at induction and take part in regular updates at least annually.

Staff who work directly with children and leaders should also be familiar with Annex A of KCSIE, which provides further information on specific forms of abuse, exploitation and safeguarding issues.

All staff must know:

- That they have a responsibility to provide a safe environment in which children can learn;
- The signs and indicators of abuse, neglect, exploitation, modern slavery and child-to-parent or caregiver abuse;
- That abuse may occur inside or outside the home, inside or outside the academy, online or offline, and that online and offline harms often overlap;
- That children may not feel ready or able to tell someone they are being abused, neglected or exploited and may not recognise their experiences as harmful;
- The importance of professional curiosity and of building trusted relationships that enable communication;
- The academy's reporting and recording processes, including how to use the safeguarding recording system and what to do if they cannot access it;
- The process for referrals to community-based early help, Family Help, local authority children's social care and statutory services;
- The safeguarding response to children who are absent from education, particularly on repeated occasions or for prolonged periods;
- The expectations, roles and responsibilities for online safety, filtering and monitoring;
- How to report concerns about an adult, including low-level concerns, allegations, whistleblowing concerns and concerns involving contractors, supply staff, trainee teachers or volunteers; and
- That if they are in any doubt, they must speak to the DSL or a deputy.

Staff must act immediately where they have any concern about a child. They must not wait for proof, investigate the matter themselves, promise confidentiality to a child or assume that someone else will take action. If a child is in immediate danger or at risk of serious harm, staff must contact the DSL or a deputy immediately and, where necessary, call 999.

5.5 SENCo, Designated Teacher, attendance and mental health leads

Safeguarding is strengthened when key leaders work together. The SENCo will work closely with the DSL where there are concerns about children with SEND, communication needs, medical conditions or additional vulnerabilities. The Designated Teacher will work with the DSL to promote the safety, welfare and educational outcomes of children in care and children previously in care. Attendance leads must treat repeated or prolonged absence as a possible

safeguarding indicator and ensure concerns are shared with the DSL. Mental health leads must work with the DSL where emotional wellbeing, self-harm, eating difficulties, suicidal ideation or other mental health needs may indicate safeguarding risk.

5.6 Visitors, volunteers, supply staff, contractors and trainee teachers

Adults who work in or visit the academy must receive safeguarding information proportionate to their role and level of contact with children. This must include the identity of the DSL and Deputy DSLs, how to report a concern about a child, how to report a concern about an adult, relevant conduct expectations and emergency procedures. The academy will maintain appropriate checks, supervision and risk assessment arrangements in line with KCSIE 2026, safer recruitment requirements and Trust procedures.

6. Training, induction and supervision

Safeguarding training must be integrated with the Anglian Learning's wider safeguarding culture, online safety arrangements, curriculum planning, behaviour approach and inclusion strategy. Training must equip staff to identify concerns, respond to disclosures, record accurately, understand local thresholds, share information lawfully, support children, escalate where necessary and reflect on their own professional conduct.

At induction, all Anglian Learning staff must receive:

- This Safeguarding and Child Protection Policy;
- Part One of KCSIE in full;
- The Staff Code of Conduct, including low-level concerns, allegations, whistleblowing, acceptable use of technology, mobile devices, social media and staff-pupil communication;
- The safeguarding response to children who are absent from education;
- Online safety training, including filtering and monitoring expectations; and
- Information about the DSL, Deputy DSLs and local reporting arrangements.

The DSL and Deputy DSLs must undertake training at least every two years and must update their knowledge and skills at least annually through safeguarding partner briefings, Trust safeguarding meetings, bulletins, supervision, case learning or additional training. Governors and trustees must receive safeguarding training at induction and regular updates thereafter. Supply staff, trainee teachers, volunteers and contractors must receive safeguarding information appropriate to their role before or at the start of their work in the academy.

Staff must receive safeguarding updates at least annually and more frequently where risk, guidance, local safeguarding learning or Trust priorities require it.

7. Prevention and safeguarding through the curriculum

Anglian Learning will ensure and annually audit that all academies will:

Teach safeguarding through a planned, age-appropriate and inclusive curriculum, including Relationships, Sex and Health Education, PSHE, computing, assemblies, pastoral provision and wider curriculum opportunities. Teaching will help children understand how to stay safe, how to seek help and how to recognise unsafe relationships, exploitation, abuse, bullying, harassment and online harm.

The curriculum must help pupils understand:

- Healthy and respectful relationships, consent, privacy, boundaries and help-seeking;
- How to recognise and report abuse, harassment, violence, coercion, control, exploitation and bullying;
- Online risks, including contact, conduct, content and commerce risks, harmful online material, scams, gaming, livestreaming, pornography, misogynistic or extremist content, and the making or sharing of nudes and semi-nudes;
- The risks associated with generative AI, including inaccurate content, manipulation, grooming, harmful prompts, deepfakes and nudes;
- The law and responsibilities in relation to online behaviour, sharing intimate images, consent, exploitation, harassment and violence.
- How to report online concerns and preserve evidence where appropriate;
- Equality, inclusion and respect for protected characteristics;
- How prejudice-based and discriminatory behaviours can harm children and create unsafe cultures;
- Where to find trusted adults and external sources of support;
- Curriculum content must be adapted for age, developmental stage, SEND, communication needs, trauma history and local safeguarding context;
- External visitors or agencies must be checked and briefed so that their contribution aligns with the academy's safeguarding, curriculum and equality duties.

7.1 Safeguarding curriculum map

Anglian Learning will ensure that its academies maintain a safeguarding curriculum map. This will be reviewed at least annually, showing where pupils are taught about personal safety, trusted adults, safe and unsafe secrets, consent and permission-seeking, online safety, exploitation, harassment, prejudice-related behaviour, help-seeking and sources of support. The map should demonstrate how content is sequenced by age and stage, adapted for SEND and communication needs, and informed by the academy's safeguarding context.

8. Procedures for concerns about a child

8.1 Immediate action

Any member of staff who has a concern about a child's welfare must act immediately. The concern must be reported to the individual academy DSL or a Deputy DSL, verbally if required, and then written up through MyConcern. Where a child is in immediate danger or at risk of serious harm, staff must call 999 or take emergency action and inform the DSL as soon as possible.

Any member of staff may make a direct referral to local authority children's social care and/or the police where a child is at risk of harm, particularly where the DSL or Deputy DSL is unavailable, or any delay would increase risk. The DSL must be informed as soon as practicable.

8.2 Responding to a disclosure

When a child tells a member of staff that they are being abused, exploited, neglected or harmed, the staff member must listen carefully, remain calm, reassure the child that they have done the right thing by speaking, avoid leading questions, and explain that information must be shared with those who need to know in order to keep the child safe.

Staff must make a factual record as soon as possible, using the child's words as accurately as possible, and must record the date, time, people present, any visible injuries, actions taken and who was informed. Opinion must be clearly distinguished from fact.

Staff must never promise confidentiality, investigate, ask the child to repeat the disclosure unnecessarily or confront an alleged perpetrator.

8.3 DSL decision-making

The DSL or deputy will consider the concern, the child's immediate safety, previous records, the child's wishes and feelings, wider contextual risk, the needs of other children and local thresholds. Possible responses include internal pastoral support, community-based early help, targeted Family Help, referral to local authority children's social care, police contact, Channel referral, LADO consultation, specialist health or mental health support, or a combination of responses.

Where parents or carers are informed, the discussion and any agreed actions must be recorded. Where a decision is made not to inform parents or carers, for example because doing so may place the child or another person at immediate risk of harm, increase vulnerability, or prejudice a police or children's social care response, the rationale must be recorded clearly in MyConcern.

The DSL will use local safeguarding partnership thresholds and professional judgement. Where there is uncertainty, the DSL will seek advice from local authority children's social care, the MASH or from the Director of Inclusion. Seeking advice must not delay urgent action where a child may be at risk of harm.

8.4 Community-based early help, Family Help and statutory intervention

Any child may benefit from support before statutory intervention. Community-based early help includes support available through universal and local services as needs emerge. Family Help refers to targeted early help delivered through a coordinated offer for children and families whose needs require more structured intervention. Staff must know the local criteria for early help, Family Help, Section 17 child in need support and Section 47 child protection enquiries.

The DSL will usually lead or coordinate academy involvement in early help and Family Help processes. If a child's situation does not improve, or if risk increases, the DSL must consider escalation to children's social care. Where there is reasonable cause to suspect that a child is suffering or is likely to suffer significant harm, a referral to local authority children's social care and, where appropriate, the police must be made without delay.

8.5 Escalation and professional challenge

If staff remain concerned that action taken is insufficient to protect a child, they must escalate their concern to the DSL, Headteacher, the Trust Director of Inclusion or relevant external agency. Professional disagreement must be handled through local escalation procedures, but disagreement must not delay protective action.

9. Information sharing, confidentiality and records

Effective safeguarding depends on timely, proportionate and lawful information sharing. No single practitioner can have a full picture of a child's needs and circumstances. Staff must share information that may be critical to keeping a child safe and must not allow fears about data protection to stand in the way of safeguarding and promoting the welfare of children.

Data protection laws do not prevent the sharing of information for safeguarding purposes. The academy will process and share personal information fairly, lawfully and securely, and will apply relevant data protection principles. Where there is doubt, staff should speak to the DSL or Data Protection Officer, but this must not delay action where a child is at risk.

The DSL will consider what information should be shared, with whom, for what purpose, and whether sharing is necessary and proportionate. Where information is shared, the rationale should be recorded, including any risk assessment where the decision is complex. Staff must not discuss safeguarding information with those who do not need to know, including other pupils, parents, carers or colleagues.

Child protection records must be factual, accurate, secure, timely and clearly distinguish between observation, allegation, opinion and professional judgement. Records must include the concern, action taken, rationale for decisions, referrals made, outcomes, child voice where appropriate and review arrangements.

Any Subject Access Request, Freedom of Information request, or other request for access to safeguarding or child protection records must be referred immediately to the DSL, Headteacher and Data Protection Officer. The academy must consider whether disclosure could place a child or another person at risk of serious harm, reveal third-party information, or prejudice the prevention or detection of crime. Where the serious harm test or another exemption may apply, the academy must seek Data Protection Officer and/or legal advice before disclosure and must record the rationale for any decision to share, redact or withhold information.

When a child moves to another school or college, the child protection file must be transferred securely and promptly to the new setting's DSL. This should normally happen within five school days for an in-year transfer or within the first five school days of the start of a new term where the transfer is at a normal transition point. The academy will obtain confirmation of receipt and keep a record of the transfer. Where necessary, the DSL will speak directly to the receiving DSL so that key risks are understood and support is not interrupted.

The academy will ensure that staff are aware of the developing statutory Information Sharing Duty and will update local procedures as further national guidance becomes available.

10. Children who may be at greater risk of harm

Any child can be abused, neglected, exploited or harmed. Some children may face additional barriers to being safe, being heard or receiving support. Staff must avoid assumptions and must consider the interaction between vulnerability, context, identity, disability, mental health, family circumstances, school experience, online activity and peer relationships.

10.1 Children who need or have needed a social worker

Children who need or have needed a social worker may have experienced abuse, neglect or complex adversity. The DSL will use this information, where known, to inform decisions about safety, welfare, attendance, behaviour, curriculum access and educational outcomes. Relevant information will be shared with staff who need it in order to support the safety, welfare and educational outcomes of the child.

Where a pupil is subject to a Child Protection Plan, the academy must notify the allocated social worker or relevant children's social care team immediately if the pupil is suspended, permanently excluded, has an unexplained absence, or there is any significant change in circumstances. Where a pupil subject to a Child Protection Plan leaves the academy, the DSL must ensure that the receiving school's DSL, the allocated social worker and, where applicable, the Child Protection Chair are informed promptly and that records are transferred securely.

10.2 Children in care, previously in care and kinship care

The Designated Teacher will work with the DSL, Virtual School Head, carers, social workers and relevant professionals to promote the safety, welfare and educational outcomes of children in care and children previously in care. The academy will also be alert to the needs of children living in kinship care or other family and friends arrangements and will seek advice where safeguarding, attendance or support concerns arise.

Staff should recognise that care leavers may continue to experience vulnerability and may require additional support and safeguarding consideration.

10.3 Children absent from education

Absence from education, particularly repeated or prolonged absence, may be a safeguarding concern. The academy will respond promptly to unexplained absence, follow first-day response and escalation procedures, analyse patterns, conduct home contact or visits where appropriate, and involve the DSL where absence may indicate abuse, neglect, exploitation, mental health concerns, family difficulties or risk of going missing. Attendance work must be linked to safeguarding, inclusion and Family Help where appropriate. The academy will also consider the role of Virtual School Heads in supporting attendance for children with a social worker or who have previously had one.

The academy will seek to maintain more than one emergency contact number for every pupil wherever reasonably possible.

10.4 Children in alternative provision

Children attending alternative provision remain the safeguarding responsibility of the commissioning academy. The academy must obtain safeguarding assurances before placement, maintain regular contact with the provider and pupil, receive

daily attendance information, respond immediately to absence, review the quality and safety of provision, and ensure the pupil's voice is heard. The academy will consider the early help and Family Help needs of pupils in alternative provision and their families.

Detailed safeguarding expectations for alternative provision are set out in Section 16.1 and Appendix C. Placements must be reviewed regularly and immediately where safeguarding concerns arise.

10.5 Children with SEND, disabilities, health issues or medical conditions

Children with SEND, disabilities, health conditions or medical conditions may face additional safeguarding barriers. Staff must not assume that indicators of abuse relate only to the child's needs, communication barriers, dependency on adults, isolation, bullying, intimate care risks, behaviour being misread, online vulnerability, or difficulties being heard and believed. The SENCo and DSL must work together to ensure concerns are identified, reasonable adjustments are made, communication is accessible and safeguarding responses are not diluted or delayed. Staff must also understand the safeguarding implications of children's medical conditions, individual healthcare plans, medication, emergency arrangements and intimate care.

Where children have communication needs, the academy will ensure that safeguarding routes are accessible. This may include agreed communication systems, visual supports, trusted adults, reasonable adjustments, specialist support, or liaison with parents and professionals where this is safe and appropriate. Staff must be alert to changes in presentation or behaviour as possible communication of distress, harm or unmet need.

10.6 Young carers

Young carers may experience fatigue, absence, emotional stress, isolation, caring responsibilities beyond their age and reduced access to opportunities. Staff must be alert to signs that a child is caring for a family member and must share concerns with the DSL so that support, early help, Family Help or a young carers referral can be considered. Where appropriate and where doing so would not place a child at additional risk, parents or carers should be informed and involved in support planning.

10.7 Children requiring mental health support

Mental health problems can be an indicator of abuse, neglect, exploitation or other harm and can also become a safeguarding concern in their own right. Staff must be alert to significant changes in behaviour, attendance, withdrawal, sleep difficulties, eating difficulties, self-harm, suicidal ideation, suicide planning, neglect of self, escalating distress or disclosures. Only appropriately trained professionals should diagnose mental health conditions, but school staff are well placed to identify concerns and seek help.

Where a mental health concern is also a safeguarding concern, staff must speak to the DSL or a deputy. If a child is in immediate danger, staff must call 999 or arrange urgent emergency medical help. If urgent mental health help is needed but it is not an emergency, staff should seek appropriate local support, including NHS 111 mental health options where applicable, and inform the DSL.

10.8 Children who are lesbian, gay or bisexual, and children questioning their gender

Children who are lesbian, gay or bisexual, or who are questioning their gender, are not inherently at greater safeguarding risk because of their identity or questioning. However, they may be more vulnerable where they experience bullying, prejudice, family rejection, isolation, online targeting, mental health difficulties or barriers to trusted adult support. Staff must act with professional curiosity, provide care, dignity and respect while responding to safeguarding concerns in line with KCSIE 2026, equality duties, local procedures and the child's best interests.

All incidents of prejudice-based bullying will be recorded, addressed and reviewed. The DSL will oversee safeguarding support and risk assessment where individual circumstances warrant additional consideration.

Any request for support related to social transition must be considered carefully, sensitively and on an individual basis. The academy will consider the child's welfare, safeguarding, developmental needs, parental involvement unless this would place the child at risk, equality and human rights considerations, the rights and safety of other children, and the practical constraints set out in KCSIE 2026. All decision-making and rationale must be recorded on MyConcern and reviewed by the DSL.

Any social transition cannot include allowing access to toilets, changing rooms, boarding or residential accommodation designated for the opposite sex, and will not include allowing children to join PE classes designated for the opposite sex where there are safety reasons for single sex PE.

11. Specific safeguarding issues

The academy will ensure that staff understand the range of safeguarding issues that may affect children. This list is not exhaustive and safeguarding issues often overlap.

Victims will receive ongoing safeguarding, pastoral and educational support for as long as required. Support arrangements will be reviewed regularly and adjusted in response to the child's wishes, needs and wellbeing.

11.1 Abuse, neglect and exploitation

Staff must be alert to physical abuse, emotional abuse, sexual abuse, neglect, exploitation and modern slavery. Harm may occur within or outside the family, within or outside school, online or offline, and may involve adults or other children. Children may also cause harm to other family members, often referred to as child-to-parent or caregiver abuse.

11.2 Child criminal exploitation and child sexual exploitation (CCE and CSE)

CCE and CSE occur where a person or group takes advantage of a power imbalance to coerce, manipulate or deceive a child into criminal or sexual activity. This may involve organised networks or gangs, movement of children, threats, debt, status, gifts, violence or perceived relationships. It may constitute modern slavery. Children cannot consent to being exploited and may not recognise that exploitation is happening. The victim may or may not identify as being part of an organised network or gang.

11.3 Child sexual exploitation (CSE)

CSE is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

11.4 Risks Outside the Home/ Contextual Safeguarding

Where local safeguarding partnerships provide contextual safeguarding, exploitation, harmful sexual behaviour or Risks Outside the Home tools, DSLs must use the relevant local assessment tool, consultation route or referral pathway. For Cambridgeshire academies, this includes consideration of the Cambridgeshire and Peterborough Risks Outside the Home assessment process where there are concerns about criminal exploitation, sexual exploitation, trafficking, serious violence or other extra-familial harm.

11.5 County lines and serious organised crime

Children may be exploited to transport drugs, money or weapons, hold debt, commit offences such as shoplifting or pickpocketing, or use violence. Staff must be alert to unexplained money or possessions, missing episodes, changes in friendship groups, multiple phones, fear, injuries, travel patterns, or association with older individuals.

11.6 Modern slavery and trafficking

Where a child may be a victim of modern slavery, trafficking or exploitation, the DSL will consider child protection and modern slavery referral routes in line with local procedures.

11.7 Domestic abuse

Domestic abuse may be psychological, physical, sexual, financial or emotional and may be a single incident or a pattern of incidents. Children are victims where they see, hear or experience the effects of domestic abuse, including in their own intimate relationships. The academy will act on information from Operation Encompass or equivalent local arrangements and will provide support proportionate to the child's needs.

Where Operation Encompass or an equivalent police notification arrangement operates, the DSL, Domestic Abuse Lead or named Operation Encompass Key Adult will review the information promptly, decide what support or protective action may be required, and record the notification and response within the confidential safeguarding record. Information must be shared only with staff who need it in order to safeguard and support the child.

11.8 Female genital mutilation

All staff must report concerns about FGM to the DSL. Teachers have a specific legal duty to report to the police where, in the course of their work, they discover that an act of FGM appears to have been carried out on a girl under 18.

11.9 Honour or faith-based abuse and forced marriage

Concerns about forced marriage, honour-based abuse, breast ironing, abuse linked to faith or belief, or any practice causing harm must be reported to the DSL immediately.

11.10 Prevent and radicalisation

The academy will comply with the Prevent duty, teach pupils about extremist risks in an age-appropriate way, and make referrals to Channel where appropriate. Information relevant to Channel or terrorism-related risk may need to be shared with the police in line with statutory guidance and local procedures.

11.11 Serious violence and weapons

Staff must report concerns about carrying, threatening with or using weapons; serious physical assault; gang association; intimidation; peer conflict; or coercion into violence. The DSL will assess risk, consider police or children's social care involvement, and take action to protect victims and children who may also be at risk of being drawn into violence.

11.12 Self-harm, suicidal ideation and suicide risk

Concerns about self-harm, suicidal thoughts, suicide planning, eating disorders or acute mental health risk must be treated as safeguarding concerns where risk to life, serious harm or underlying abuse or neglect may be present.

11.13 Substance misuse by pupils and in the home

Concerns about alcohol, drugs, vaping, dependency or associated criminality must be considered in the wider safeguarding context. A child's substance misuse may increase vulnerability to exploitation, mental or physical harm, unsafe relationships, criminality or neglect. Substance misuse by parents, carers or household members may affect supervision, emotional availability, routines, safety, finances and parental capacity, particularly where combined with domestic abuse, adult mental health needs or criminal activity. Staff must report concerns to the DSL so that early help, Family Help, specialist substance misuse support or statutory referral can be considered.

11.14 Bullying and prejudice-related harm

Bullying, cyberbullying, all prejudice-based bullying, and discriminatory behaviour must be challenged, recorded on MyConcern and addressed as part of the academy's safeguarding culture. Any prejudice related incidents will be responded to in accordance with local and national policies and procedures.

11.15 Making or sharing nudes and semi-nudes, including where generated by AI

The creation, sending, posting, possessing, requesting or sharing of nude or semi-nude images by or involving children must receive a safeguarding response, whether described as consensual or non-consensual. Images may be photographs, videos or livestreams; they may be taken by the child, taken or created by another person, digitally altered or generated using AI, including deepfakes or deep nudes. Incidents must be reported to the DSL and handled in line with UKCIS guidance, searching, screening and confiscation advice, and child protection procedures. DSLs and staff should refer to Sharing nudes and

semi-nudes: advice for education settings working with children and young people (GOV.UK).

11.16 Cybercrime and harmful online activity

Children may be drawn into cyber-dependent crime or harmful online communities. Concerns about hacking, malware, phishing, online fraud, image-based abuse, coercion, extremist content, harmful online challenges or risks arising from generative AI must be reported to the DSL.

11.17 Private fostering and children living away from home

The academy must notify the local authority where it becomes aware of a private fostering arrangement. Staff must also be alert to safeguarding concerns linked to temporary accommodation, homelessness, staying with friends, family breakdown or children living away from their usual carers.

Private fostering is an arrangement where a child under 16, or under 18 if disabled, is cared for 28 days or more by someone who is not their parent, does not have parental responsibility and is not a close relative. Staff must share any possible private fostering arrangement with the DSL so that the local authority can be notified.

11.18 Elective home education

Where parents or carers elect to home educate, the academy will follow local procedures, consider safeguarding context, share relevant information with the local authority and act where there are concerns that home education may increase risk or conceal harm.

11.19 Children affected by parental imprisonment or offending

Children with a parent, carer or close family member in prison, custody or otherwise affected by offending may experience stigma, anxiety, financial hardship, disrupted care, attendance difficulties or emotional distress. The academy will respond sensitively, share information only on a need-to-know basis, and consider support through trusted adults, pastoral systems, Family Help or specialist organisations where appropriate.

11.20 Additional vulnerabilities

In addition to those situations described above, staff should also be particularly alert to the potential need for additional support before statutory intervention for children who:

- are pregnant or parents themselves;
- are severely absent;
- have been repeatedly removed from class;
- have experienced multiple suspensions;
- are on a part-time timetable;
- are at risk of permanent exclusion;
- are on a managed move or offsite direction;
- are in alternative provision or a pupil referral unit.

These factors must be considered alongside the child's lived experience, attendance, behaviour, SEND, mental health, family context, online activity and peer relationships.

12. Child-on-child abuse, harassment and violence

Children can abuse other children. Child-on-child abuse can happen inside or outside school and online. It includes bullying, prejudice-based and discriminatory bullying, abuse in intimate personal relationships, physical abuse, serious physical assault or threats involving weapons, sexual violence, sexual harassment, causing someone to engage in sexual activity without consent, making or sharing nudes and semi-nudes, upskirting, initiation or hazing rituals, online abuse and other harmful behaviour.

All staff must understand that the absence of reports does not mean that abuse is not happening. Children may not report abuse because of fear, shame, peer pressure, threats, normalisation, loyalty, disability, communication barriers, uncertainty about whether they will be believed or concern about what will happen next. Staff must remain professionally curious and must speak to the DSL where they have any concern.

Child-on-child abuse is a safeguarding issue for both the victim and the alleged perpetrator. A child who has harmed another child may also have unmet needs, trauma, exploitation, exposure to harmful material or other vulnerabilities. This does not reduce accountability or the need to protect victims, but it means the academy must consider safeguarding support, risk assessment and appropriate intervention for all children involved. Victims must be reassured that they are not creating a problem and are not to blame. Support for victims will continue for as long as necessary and will not be dependent upon the outcome of police, social care, disciplinary or criminal justice processes.

All reports, concerns and disclosures relating to child-on-child abuse must be recorded on MyConcern, including where behaviour does not meet a criminal threshold or where a report is not progressed beyond initial enquiries.

Child-on-child abuse is preventable. Anglian Learning will ensure that their academies challenge inappropriate behaviour early, teach healthy relationships and consent, supervise higher-risk times and places, respond to patterns, analyse records, involve children in identifying unsafe spaces, and use timely evidence-based support to prevent escalation. Sexual harassment or other harmful behaviours must never be dismissed as banter, boys being boys, part of growing up or inevitable peer behaviour.

Where a report or concern arises, the DSL will consider the child's wishes and feelings, immediate safety, the nature of the incident, power imbalance, age and developmental stage, SEND, previous incidents, online elements, wider peer context, risk to others, possible criminality and whether to involve parents, carers, Family Help, children's social care, the police or specialist services.

12.1 Harmful Sexual Behaviour, Sexual Harassment and Sexual Violence between children

Harmful sexual behaviour can occur between two or more children of any age and sex, from primary through to secondary stage and into college. It can occur also through a group of children towards a single child or towards another group of

children. Harmful sexual behaviour exists on a continuum and may escalate into sexual harassment or sexual violence; it can occur online and face-to-face (both physically and verbally) and is never acceptable.

Children who are victims of harmful sexual behaviour, sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college.

Anglian Learning must ensure that academies:

- Refer to Keeping Children Safe in Education Part Five, 2026, for full details of procedures to be followed in such cases. Also see Sharing nudes and semi-nudes: advice for education settings working with children and young people (UKCIS, March 2024).
- Make it clear that there is a zero-tolerance approach to sexual violence and sexual harassment, that it is never acceptable, and it will not be tolerated.
- Provide training for staff on how to manage a report of sexual violence or sexual harassment.
- Reassure victims that they are being taken seriously and offer a supportive and respectful response, balancing the victim's wishes with the duty to protect them and other children.
- Implement measures to keep the victim, alleged perpetrator and if necessary other children and staff members, safe. Record any risk assessments and keep them under review.
- Give consideration to the welfare of both the victim(s) and perpetrator(s) in these situations.
- recognise that rape, assault by penetration, sexual assault and causing someone to engage in sexual activity without consent are criminal offences. The DSL will consider police involvement and social care referral in all such cases, and will liaise closely with external agencies, including police, social care and the Cambridgeshire Harmful Sexual Behaviour Service when required.

13. Online safety, filtering, monitoring, mobile phones and generative AI

Technology is a significant component in many safeguarding and wellbeing issues. The academy will maintain a whole-school approach to online safety through curriculum, filtering and monitoring, staff training, parent communication, behaviour systems, incident response, information security and leadership oversight.

Staff must understand the four areas of online risk:

- **Content:** being exposed to illegal, inappropriate or harmful content, including pornography, fake news, self-harm, suicide, misogyny, extremist material, racism and harmful AI-generated content;
- **Contact:** being subjected to harmful online interaction with other users, including adults posing as children, grooming, exploitation, radicalisation or peer-to-peer abuse;
- **Conduct:** personal online behaviour that increases risk, including making or sharing nudes and semi-nudes, cyberbullying, harassment, abusive messages, deepfake creation, livestreaming risks or sharing personal information; and

- **Commerce:** risks such as online gambling, inappropriate advertising, scams, financial exploitation, blackmail, phishing or in-app purchases.

Where remote education is used, the academy will reinforce online safety expectations with pupils, parents and carers, including what platforms are used, what pupils are asked to access, who they will interact with, how concerns should be reported and how filtering and monitoring arrangements operate.

13.1 Filtering and monitoring

The Trust Board, Local Governing Body and academy leaders must ensure that appropriate filtering and monitoring systems are in place. The DSL has lead responsibility for safeguarding oversight of filtering and monitoring, working with the senior leader responsible for filtering and monitoring and IT support. Systems must be appropriate, effective and not unreasonably restrictive of learning.

The effectiveness of filtering and monitoring must be reviewed at least once every academic year. Reviews must be carried out by the senior leader responsible for filtering and monitoring, with support from the DSL and IT support. Reviews must include checks that filtering is working appropriately on all internet-connected devices in all relevant locations, including devices used by pupils and staff, and records of checks and actions must be kept. Staff must know how to report filtering or monitoring concerns and how to escalate if they believe a pupil can access harmful content or if a legitimate learning resource is blocked in a way that impedes education.

13.2 Mobile phone-free expectations

All Anglian Learning academies will be mobile phone-free environments for pupils by default throughout the school day. Pupils must not have access to mobile phones during lessons, between lessons, breaktimes or lunchtime unless an individual exception has been agreed by the headteacher for a legitimate safeguarding, medical or access reason. Each academy will publish details of how they intend to prevent pupils from having access to mobile phones in their academy safeguarding policy. Staff use of mobile devices must comply with the Staff Code of Conduct and acceptable use requirements.

13.3 Generative AI

Generative AI can support learning and workload when used safely and appropriately, but it also creates safeguarding risks. These include misinformation, harmful prompts, impersonation, grooming, manipulation, bullying, image-based abuse, deepfakes, deep nudes, academic dishonesty, privacy risks and the amplification of harmful content. Staff and pupils must follow academy and Trust expectations on safe, ethical and age-appropriate AI use. Safeguarding concerns linked to AI must be reported to the DSL.

13.4 Information security

The academy will maintain appropriate information security and cyber security arrangements to protect children, staff and systems. Staff must use approved systems, protect passwords, avoid unauthorised devices or accounts, report data breaches or cyber incidents promptly, and follow Trust procedures for secure storage, sharing and retention of safeguarding information.

14. Preventing unsuitable people from working with children

All staff must read Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings (February 2022) on induction and as and when it is updated.

Anglian Learning will ensure that staff, supply staff, trainee teachers and volunteers are aware that sexual relationships with pupils aged under 18 are unlawful and could result in legal proceedings taken against them under the Sexual Offences Act 2003 (Abuse of Position of Trust).

14.1 Safer recruitment and adult suitability

Anglian Learning will prevent unsuitable people from working with children by applying safer recruitment and selection procedures, pre-appointment checks, single central record requirements, induction, supervision, ongoing vigilance and statutory referral duties. Recruitment panels must include at least one person trained in safer recruitment.

Recruitment processes must include safeguarding information in adverts and application materials, scrutiny of employment history and gaps, references obtained directly from referees, identity and qualification checks, prohibition and direction checks where required, barred list and DBS checks appropriate to the role, right to work checks, section 128 checks where applicable, checks through DfE's Check a teacher's record service where relevant, and other checks required by KCSIE 2026, local procedures and Trust policy.

As part of due diligence, Anglian Learning will carry out an online search on shortlisted candidates to help identify matters that may be relevant to suitability to work with children. Candidates will be informed that online searches may be undertaken. Searches must be proportionate, consistent, focused on safeguarding suitability and carried out in line with data protection and equality duties.

The single central record must include all required checks for staff, supply staff, trainee teachers, volunteers, governors, trustees and others as required by KCSIE 2026 and Trust procedures. The record must be quality assured regularly and errors must be corrected without delay.

14.2 Volunteers

Volunteers must be risk assessed and checked in line with KCSIE 2026. The previous supervision exemption from regulated activity has been removed. A person volunteering in a school or college in a role involving teaching, training, instructing or supervising children frequently, on more than three days in any 30-day period, or overnight, is in regulated activity. Where this applies, the academy must ensure that the appropriate enhanced DBS check with children's barred list information is obtained.

Volunteers who are not in regulated activity must still be subject to proportionate safeguarding checks. A written risk assessment must be undertaken to determine what checks, if any, are appropriate, taking account of the nature of the role and the volunteer's contact with children. A volunteer on whom no checks have been obtained must not be left unsupervised or allowed to undertake regulated activity. Volunteers must also receive appropriate safeguarding induction, understand

relevant conduct expectations and be supervised in accordance with their role and the academy's risk assessment.

14.3 Visitors and Contractors

Visitors and other adults on site must be managed according to the purpose of their visit, the nature and frequency of their contact with children, whether the activity constitutes regulated activity, and the safeguarding checks required under KCSIE 2026.

For ordinary visitors, such as parents, relatives or individuals attending academy events, academies should not routinely seek DBS or barred list checks. The Headteacher must use professional judgement to determine whether the visitor needs to be escorted or supervised, taking account of the purpose of the visit and their anticipated contact with children.

Visitors attending in a professional capacity must have their identity checked and the academy must be assured that any DBS checks appropriate to the activity they are undertaking have been completed. Where a professional visitor will have no contact with children, a DBS check is unlikely to be required.

Contractors and self-employed workers must be subject to the specific checking requirements set out in KCSIE 2026. Contractors undertaking regulated activity must have an enhanced DBS check including children's barred list information. Contractors who are not undertaking regulated activity but have the opportunity for regular contact with children must have an enhanced DBS check without barred list information. Where there is no opportunity for regular contact with children, the academy must determine whether a basic DBS check is appropriate.

Under no circumstances may a contractor on whom no checks have been obtained work unsupervised or undertake regulated activity with children. The academy must determine the appropriate level of supervision in such circumstances. The identity of all contractors must be checked on arrival.

Agency and third-party staff, trainee teachers and other adults working in or on behalf of the academy must be managed in accordance with the specific requirements of KCSIE 2026 and Trust procedures.

Safer recruitment does not end at appointment. Leaders must maintain a culture of ongoing vigilance, respond to concerns about conduct, review suitability where information emerges, and make statutory referrals to the DBS, Teaching Regulation Agency, LADO, police or other body where required. Duties to refer apply to staff and volunteers where relevant thresholds are met.

Anglian Learning will fulfil its legal duties to make referrals to the Disclosure and Barring Service (DBS), the Teaching Regulation Agency (TRA) and any other relevant regulatory or statutory body where statutory thresholds are met following advice from the People Services Team.

14.4 Concerns or allegations that may meet the harm threshold

Any concern or allegation that an adult working in or on behalf of Anglian Learning Trust has behaved in a way that has harmed a child or may have harmed a child, may have committed a criminal offence against or related to a child, may pose a risk of harm to children, or may not be suitable to work with

children must be reported without delay to the Director of People. If the concern is about a line manager, it must be reported to the Director of People or the CEO.

The nominated case manager must consider immediate safety, inform the academy DSL where a child may be at risk, contact children's social care or police in an emergency, and consult the LADO and the Trust's People Services Team in line with local procedures. All referrals to the LADO must be made within one working day.

Basic enquiries may be made to establish facts, but Anglian Learning must not investigate in a way that could compromise a police or social care investigation. Suspension is not automatic and must be considered only after risk assessment and consultation with the People Services Team and the LADO where appropriate. Anglian Learning will ensure that notification of any concerns is made to the relevant authorities and professional bodies and included in references where applicable.

Where the individual is supplied by an agency, is a trainee teacher, volunteer, contractor or employed by an external organisation, Anglian Learning will not simply cease to use the person without establishing facts and liaising with the LADO where appropriate. Agencies, employers and teacher training providers must be involved and must cooperate with enquiries. The academy shares safeguarding responsibility with third-party organisations and must ensure concerns are addressed, recorded and referred as required.

14.5 Low-level concerns

A low-level concern is any concern, no matter how small, that an adult working in or on behalf of Anglian Learning may have acted in a way that is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside work, but that does not meet the harm threshold or is otherwise not serious enough for immediate LADO referral. Low-level does not mean insignificant.

Examples may include being over-friendly with children, having favourites, taking photographs contrary to policy, one-to-one contact in secluded areas or behind closed doors without appropriate safeguards, humiliating children, inappropriate communication, boundary concerns or conduct that creates a sense of unease.

All low-level concerns must be shared responsibly through the Anglian Learning Low Level concern email address, recorded in writing, held securely and reviewed to identify patterns. Concerns must be reported as soon as possible and without unreasonable delay. Staff are encouraged to self-refer where they have acted in a way that could be misinterpreted or falls below expected professional standards. Where there is doubt about whether a concern meets the harm threshold, the academy will consult the LADO. Low-level concerns about supply staff, volunteers, trainee teachers, contractors or external providers will be shared with their employer or training provider so that patterns can be identified.

14.6 Whistleblowing, professional challenge and complaints

All adults must feel able to raise concerns about unsafe practice, poor safeguarding culture, failures to follow procedure or conduct by adults that may place children at risk. Concerns should usually be raised with the Headteacher, Chair of Governors, the Trust Safeguarding Lead, or through the Trust's People

Services Team. Staff may also use the NSPCC whistleblowing helpline or contact external agencies where appropriate.

Safeguarding complaints from parents, carers, pupils, staff or others will be handled promptly and in line with the relevant complaints, safeguarding, allegations or whistleblowing procedure. Where a complaint contains a safeguarding concern, safeguarding procedures take precedence and the matter must be referred to the DSL without delay.

15. Work experience

Work experience placements will be appropriately risk assessed and safeguarding arrangements considered in advance of placement. Anglian Learning will seek assurance from its academies that placement providers have suitable safeguarding arrangements and policies in place to protect children from harm.

Where adults supervising pupils on placement are engaged in regulated activity, the academy must seek assurance that appropriate safeguarding and vetting checks have been completed in accordance with KCSIE 2026. The academy will ensure pupils know how to raise safeguarding concerns during their placement and that concerns are reported and acted upon without delay.

16. Alternative provision, off-site activity, use of premises, sport and facilities

Safeguarding duties continue when children are educated or cared for away from the main academy site. Anglian learning will seek assurances from its academies that they ensure educational visits, work experience, alternative provision, remote education, enrichment activity, clubs, residential visits and external provision are risk assessed and managed in line with Trust procedures and statutory guidance.

16.1 Alternative provision

Anglian Learning will ensure that before placing a pupil in external alternative provision, its academies are satisfied that the provider is appropriate and safe. This includes obtaining the provider's safeguarding policy, checking safer recruitment assurances, agreeing attendance and absence reporting, confirming information-sharing routes, risk assessing the placement, and recording how the pupil's welfare, curriculum, attendance and outcomes will be monitored. The academy will also obtain written confirmation that appropriate safeguarding and vetting checks have been completed for staff working with the pupil.

The academy remains responsible for safeguarding and must review placements regularly. The academy must obtain written confirmation that the provider will notify the academy of any safeguarding arrangements, staffing changes, subcontracted provision, attendance concerns or other arrangements that may place the child at risk.

16.2 Use of academy premises by external organisations

Where Anglian Learning premises are hired, rented or otherwise used by external organisations, the academy and/or Anglian Leisure, where appropriate, will seek assurance that the provider has appropriate safeguarding and child protection policies and procedures, including safer recruitment, staff suitability, reporting arrangements and supervision. Safeguarding requirements must be included in any lease, hire or transfer of control agreement. Failure to comply with safeguarding requirements may lead to termination of the agreement.

16.3 Sport, toilets, changing rooms, showers and residential accommodation

Anglian Learning will ensure that their academies follow KCSIE 2026, statutory premises requirements and equality duties when managing toilets, changing rooms, showers, residential accommodation and single-sex sport. Academies must not allow children into toilets designated for the opposite biological sex. Separate toilets must be provided for boys and girls aged 8 and over, except where individual toilets are in a room that can be locked from the inside and are intended for use by one pupil at a time. Where a child does not wish to use the toilet designated for their biological sex, the academy should consider whether an alternative facility, such as a self-contained individual toilet, can be provided without compromising single-sex provision or the safety, comfort, privacy and dignity of any child.

In sport and PE, the academy may separate pupils by biological sex where the Equality Act permits single-sex sport because of safety or fairness considerations. Where there are no safety concerns and a child requests a different arrangement, the academy will consider the request case-by-case, taking account of safeguarding, equality duties, the best interests of the child, the impact on other children and the aim of safe and fair participation.

For changing rooms and showers, the academy must not allow a child aged 11 or over at the start of the school year to undress in front of a child of the opposite biological sex, and responding to a request for support with social transition must not include access to changing rooms designated for the opposite sex. Alternative changing or washing arrangements may include a fully enclosed room for one child at a time or access at an alternative time, provided this does not compromise the safety, comfort, privacy or dignity of any child. For residential accommodation, including trips involving overnight accommodation, the academy must not allow a child to share overnight accommodation with a child of the opposite biological sex. Any alternative arrangements must be recorded, communicated appropriately and reviewed regularly.

17. Reasonable force, seclusion and restrictive intervention

There are limited circumstances in which it is appropriate for staff to use reasonable force to safeguard children. Reasonable force means using no more force than is necessary for the least amount of time in the circumstances. This may range from guiding a child to safety to intervening to prevent violence, injury or serious damage.

Anglian Learning academies will not operate a "no contact" policy, because this could prevent staff from protecting children. Decisions about physical contact, reasonable force or restrictive intervention must be based on professional judgement, the law, the child's needs and the immediate risk. Staff must consider the additional vulnerability of children with SEND, mental health needs, trauma histories or medical conditions, and must consider reasonable adjustments and positive behaviour support plans.

Any use of reasonable force, seclusion or restrictive intervention must be recorded on MyConcern, reported to relevant leaders and reviewed. Parents or carers should be informed in writing, unless doing so would place a child at greater risk. The academy will seek to reduce the need for restrictive intervention, seclusion and

restraint through relational practice, proactive support, environmental adaptation, de-escalation, risk assessment and individual planning.

18. Monitoring, assurance and review

Anglian learning will monitor the effectiveness of safeguarding in their academies through training records, safeguarding records, attendance data, behaviour and bullying records, child-on-child abuse records, online safety reports, filtering and monitoring checks, single central record checks, pupil and staff voice, quality assurance visits, alternative provision reviews, audits, case supervision, governance reporting and lessons learned from incidents.

This policy will be reviewed at least annually and sooner if statutory guidance, local safeguarding procedures, Trust requirements, Ofsted expectations, case learning or emerging risks require change.

This Safeguarding and Child Protection Policy will be published on the Anglian learning website and made available to parents, carers and other stakeholders on request.

Appendix A. Categories of abuse

Category	Policy definition
Physical abuse	A form of abuse which may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating, fabricating or inducing illness, or otherwise causing physical harm to a child.
Emotional abuse	Persistent emotional maltreatment of a child that causes severe and adverse effects on emotional development. It may include telling a child they are worthless or unloved, imposing developmentally inappropriate expectations, preventing social interaction, seeing or hearing the ill-treatment of another, serious bullying, exploitation, corruption, or verbal abuse such as criticism, belittling and name-calling.
Sexual abuse	Forcing or enticing a child to take part in sexual activities, not necessarily involving violence and whether or not the child is aware of what is happening. It includes physical contact such as assault by penetration, rape, penetration with an object, non-penetrative acts, masturbation, kissing, rubbing or touching outside clothing. It also includes non-contact activity such as involving children in looking at or producing sexual images, watching sexual activity, encouraging sexualised behaviour, grooming and online-facilitated abuse.
Neglect	The persistent failure to meet a child's basic physical or psychological needs, likely to result in serious impairment of the child's health or development. It may involve failing to provide food, clothing, shelter, protection from harm, supervision, medical care or emotional responsiveness.
Exploitation and modern slavery	A form of abuse in which a child is coerced, controlled, manipulated or deceived into activity for the benefit of another person or group. It may be criminal, sexual, financial or labour-related and may involve trafficking, debt, threats, status, gifts, relationships or violence.
Child-to-parent or caregiver abuse	Children may also cause harm to parents, carers or other family members. This may include physical, emotional, financial or coercive behaviour. Concerns must be considered through both safeguarding and family support routes, recognising the needs and safety of all children and adults in the household.

Appendix B. Child-on-child sexual harassment and sexual violence procedure

Reports of sexual harassment, harmful sexual behaviour or sexual violence must be treated as safeguarding concerns. The academy must follow KCSIE Part Five, local safeguarding procedures, Trust guidance and Department for Education guidance on sexual violence and sexual harassment between children in schools and colleges. The response must be child-centred, proportionate and informed by risk. [KCSIE Part Five](#).

Operational response. The DSL or Deputy DSL must ensure that the response includes:

- Immediate safety planning for the victim, alleged perpetrator and any other children affected, including supervision, separation where required, and management of shared classes, corridors, transport, online spaces and unstructured times;
- A factual record of the report, the child's wishes and feelings, the rationale for decisions, and any action taken;
- Consideration of whether parents or carers should be informed, unless doing so would place a child at additional risk or compromise a police or children's social care response;
- Consideration of the needs of siblings and other affected children, including pupils who witnessed the incident, were part of the wider peer group, or may be at risk because of intra-familial harm or peer dynamics;
- A risk and needs assessment for the victim, alleged perpetrator and other children affected, taking account of age, developmental stage, SEND, communication needs, power imbalance, previous incidents, extra-familial risk, online elements and harmful sexual behaviour;
- A decision on the appropriate route, including internal support, Family Help, children's social care, police, specialist harmful sexual behaviour advice, health or mental health support, or a combination of these routes;
- A commitment not to wait for the outcome of any police or children's social care process before putting proportionate safeguarding support in place; and
- Ongoing review of safety and support arrangements, including curriculum, pastoral, restorative, disciplinary or risk management actions where appropriate.
- Use of local harmful sexual behaviour assessment tools, consultation routes or specialist services where available. For Cambridgeshire academies, DSLs should consider the Cambridgeshire and Peterborough Child Sexual Behaviour Assessment Tool and specialist harmful sexual behaviour advice where the child's behaviour may be problematic, abusive or violent;
- Where pupils involved in an incident share classes, routes, transport, online spaces, social groups or unstructured times, the DSL must ensure that arrangements are actively managed, recorded and reviewed so that the victim is protected and all children receive appropriate support.

- For reports involving rape, assault by penetration, sexual assault or causing someone to engage in sexual activity without consent, the DSL must consider immediate police contact and children's social care referral, while continuing to put safeguarding and pastoral support in place within the academy.
- Where there are concerns that require support, advice or review beyond academy level, the DSL must contact the Director of Inclusion.

Appendix C. Alternative provision safeguarding expectations

Stage	Expectation
Before placement	Assess suitability, obtain provider safeguarding policy, confirm staff checks and safer recruitment assurances, agree attendance reporting, establish emergency and safeguarding contacts, share relevant risk and support information, agree review dates and ensure parental communication as appropriate.
During placement	Receive daily attendance, respond immediately to absence, maintain regular contact with the pupil and provider, review welfare and progress, monitor safeguarding records and ensure the pupil knows how to raise concerns with both the provider and the academy.
If concerns arise	Review the placement immediately, seek advice where needed, consider Family Help or statutory referral, involve parents or carers unless unsafe, and suspend or end the placement where the pupil cannot be kept safe.

Appendix D. Training expectations

Audience	Minimum expectation
All staff	Safeguarding and child protection training including online safety at induction; Part One of KCSIE in full; regular updates at least annually; role-specific updates where risk or guidance changes. Responsibilities around attendance, behaviour and mental health. Prevent training biannually.
DSL and Deputy DSLs	Training to the same standard at least every two years; annual knowledge and skills updates; local safeguarding partner briefings; Trust safeguarding meetings; training on Family Help, information sharing, online safety, filtering and monitoring, allegations, harmful sexual behaviour, mental health, local thresholds and Prevent.
Governors and trustees	Safeguarding and online safety training at induction and regular updates to provide strategic oversight, including safer recruitment, filtering and monitoring, allegations, child-on-child abuse, SEND vulnerability and local safeguarding risks.
Supply staff, volunteers, trainee teachers, contractors and visitors	Proportionate safeguarding information before or at the start of work or visit, including DSL contacts, reporting routes, adult conduct expectations, emergency procedures and supervision arrangements.

Appendix E. Allegations and low-level concerns about adults

All concerns about adults must be reported, recorded and acted upon. The following procedure summarises the policy expectation. It does not replace local LADO or advice from the Trust's People Services Team.

All adults working in or on behalf of the academy must follow the Trust Staff Code of Conduct and should confirm that they have read and understood the current Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings.

Situation	Required action
Concern may meet harm threshold	Report immediately to headteacher or, if about headteacher, Director of Education and Trust Safeguarding Lead. Consider immediate child safety. Contact children's social care/police if emergency. Consult LADO. Record actions and rationale. Do not investigate in a way that compromises statutory enquiries.
Concern about supply staff, trainee teacher or contractor	Follow the same safeguarding process. Inform and involve the agency, employer or training provider as appropriate. Do not simply cease to use the individual without establishing facts and liaising with the LADO where required.
Concern about organisation using premises	Follow academy safeguarding procedures. Inform LADO as appropriate. Review the provider's safeguarding arrangements and consider suspension or termination of premises use if children may be at risk.
Low-level concern	Speak to headteacher and record through low level concern email address. Review for patterns. Share with employer for supply/contractor concerns. Consult LADO if unsure whether harm threshold is met.
Whistleblowing or unsafe culture	Use Trust whistleblowing routes, Chair of Governors, Trust Safeguarding Lead, external safeguarding agencies or NSPCC whistleblowing helpline as appropriate. Child safety must remain paramount.

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Appendix F. Reference documents

- Keeping Children Safe in Education 2026: statutory guidance for schools and colleges, effective from 1 September 2026.
- Working Together to Safeguard Children and local safeguarding partner arrangements.
- What to do if you are worried a child is being abused: advice for practitioners.
- Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings, February 2022.
- DfE guidance on filtering and monitoring standards, mobile phones in schools, generative artificial intelligence in education, alternative provision, attendance, children missing education, supporting pupils with medical conditions and relationships, sex and health education.
- Local safeguarding partnership procedures for the relevant academy local authority area.
- Anglian Learning safeguarding framework, safer recruitment, attendance, behaviour, online safety, SEND and inclusion arrangements.
- UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people.
- Local authority guidance on Operation Encompass, Risks Outside the Home/contextual safeguarding, harmful sexual behaviour and child protection record management.

Appendix G. Local safeguarding contacts

Academies must maintain current local safeguarding contacts and verify them before publication. Where an academy works across more than one local authority area, the DSL must ensure that the correct local threshold, MASH/social care, LADO, Prevent/Channel and out-of-hours routes are used.

Local area / route	Contact details / academy action
Cambridgeshire Education Safeguarding Team	ecps.general@cambridgeshire.gov.uk
Cambridgeshire Early Help Hub / Targeted Support Service	Tel: 01480 376666
Cambridgeshire Social Care referrals / Customer Service Centre	Tel: 0345 045 5203
Cambridgeshire Emergency Duty Team (out of hours)	Tel: 01733 234724
Cambridgeshire Police Child Abuse Investigation Unit	Tel: 101
Cambridgeshire Local Authority Designated Officer (LADO)	lado@cambridgeshire.gov.uk / Tel: 01223 727967
Cambridgeshire Prevent Officers	prevent@cambs.police.uk

Local area / route	Contact details / academy action
Suffolk Safeguarding Partnership	enquiries@suffolksp.org.uk
Suffolk Family Support Services	0808 800 4005
Suffolk Social Care referrals / Customer First	Tel: 0808 800 4005 Consultation line: 0345 6061499
Suffolk Emergency Duty Team (out of hours)	Tel: 0808 800 4005
Suffolk Local Authority Designated Officer (LADO)	lado@suffolk.gov.uk Tel: 0300 123 2044
Suffolk and Norfolk Prevent team	prevent@norfolk.police.uk

Local area / route	Contact details / academy action
Essex Education Safeguarding Team	educationsafeguarding@essex.gov.uk
Essex Child and Family Wellbeing Service	Tel: 0333 032 2958
Essex Social Care referrals	Tel: 0345 603 7627
Essex Emergency Duty Team (out of hours)	Tel: 0345 606 1212
Essex Child centred policing team	Janet.bloomfield@essex.police.uk
Essex Local Authority Designated Officer (LADO)	lado@essex.gov.uk Tel: 03330 139 797
Essex Prevent Officers	prevent@essex.police.uk 01245 452 196