

# Child and Adult Protection & Safeguarding Policy

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Authorised Principal: Sarah Miller	September 2024	
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This is a core policy that forms part of the induction for all staff. It is a requirement that all members of staff have access to this policy and sign to say they have read and understood its contents. Based on DfE 'Keeping Children Safe in Education' 2023

#### Introduction

- KITE College recognise our statutory responsibility to safeguard and promote the welfare of all learners. Safeguarding is everybody's responsibility and all those directly connected (staff, volunteers, trustees, leaders, parents, families, and learners) are an important part of the wider safeguarding system at KITE College and have an essential role to play in making this community safe and secure.
- KITE College fully recognises its responsibilities for safeguarding learners. Our learners' welfare and safety are at the heart of our college's ethos and in everything we do. We believe that all learners have the right to be safe in our society. Therefore, we recognise that we have a duty to ensure arrangements are in place for safeguarding and promoting the welfare of learners by creating a positive college atmosphere through our teaching and learning, pastoral support and care for both learners and college personnel, training for college personnel and with working with parents/carers. We teach all our learners about safeguarding. KITE College serves learners up to the age of 25, thus in this policy, a 'learner' means all children and young people below 25 years of age.
- All children (defined as those up to the age of 18 but applicable to all learners at KITE College) have a right to be heard and to have their wishes and feelings taken into account and all children regardless of age, gender, ability, culture, race, language, religion or sexual identity or orientation, have equal rights to protection.
- Staff working with learners at KITE College will maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a learner, staff will always act in the best interests of the learner and if any member of our community has a safeguarding concern about any learner or adult, they should act and act immediately.
- KITE College recognises the importance of providing an ethos and environment within college that will help learners to be safe and to feel safe. In our college learners are respected and are encouraged to talk openly. We will ensure learner's wishes and feelings are taken into account when determining what safeguarding action to take and what services to provide.

Our core safeguarding principles are:

- **Prevention:** positive, supportive, safe culture, curriculum and pastoral opportunities for learners, safer recruitment procedures.
- **Protection**: following the agreed procedures, ensuring all staff are trained and supported to recognise and respond appropriately and sensitively to safeguarding concerns.
- **Support**: for all learners, parents and staff, and where appropriate specific interventions are required for those who may be at risk of harm.
- **Collaboration** with parents and other agencies: to ensure timely, appropriate communications and actions are undertaken when safeguarding concerns arise.
- The procedures contained in this policy apply to all staff, including trustees, temporary or third-party agency staff and volunteers, and are consistent with those outlined within KCSIE 2024.

## 1.1 Policy context

• This policy is based on the Department for Education's (DfE's) statutory guidance Keeping Children Safe in Education (2024) and Working Together to Safeguard Children (2018), and the Governance

Handbook.

This policy is also based on the following legislation:

- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children.
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children
- Statutory guidance on the Prevent duty, which explains colleges' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR)
- The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race).

This means our trustees and principal should carefully consider how they are supporting their

learners with regard to these characteristics. The Act allows our college to take positive action to deal with disadvantages affecting learners (where we can show it's proportionate). This includes making reasonable adjustments for disabled learners. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment.

- The Public Sector Equality Duty (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve learner's outcomes. Some learners may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination.
- Ofsted: Education Inspection Framework
- Framework for the Assessment of Children in Need and their Families 2000
- Kent and Medway Safeguarding Children Procedures
- Section 175 of the Education Act 2002 requires college governing bodies, local education authorities and further education institutions to make arrangements to safeguard and promote the welfare of all children who are learners at a college, or who are learners under 18 years of age. Such arrangements will have to have regard to any guidance issued by the Secretary of State.
- The College Staffing (England) Regulations 2009, which set out what must be recorded on the single central record and the requirement for at least 1 person conducting an interview to be trained in safer recruitment techniques

- Education and Inspections Act 2006
- Part 3 of the schedule to the Education (Independent College Standards) Regulations 2014, which places a duty on academies and independent colleges to safeguard and promote the welfare of learners
- Part 1 of the schedule to the Non-Maintained Special Colleges (England) Regulations 2015, which places a duty on non-maintained special colleges to safeguard and promote the welfare of learners
- KITE College recognise that as a result of the Covid-19 pandemic, some members of our community may have been exposed to a range of adversity and trauma including bereavement, anxiety and in some cases experienced increased welfare and/or safeguarding risks. We will work with local services, such as health and the local authority, to ensure necessary support is in place.

#### 1.2 Definition of safeguarding

In line with KCSIE 2024, safeguarding and promoting the welfare of children (applied to all our learners)

is defined for the purposes of this policy as:

- protecting children from maltreatment
- 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 is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

Abuse is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. Appendix 3 explains the different types of abuse.

Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development.

Appendix 1 defines neglect in more detail.

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

Children includes everyone under the age of 18 (we apply this to all learners at KITE College).

The following 3 safeguarding partners are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017).

They will make arrangements to work together to safeguard and promote the welfare of local children,

- including identifying and responding to their needs:
- the local authority (LA) integrated care boards (previously known as clinical commissioning groups) for an area within the LA
- the chief officer of police for a police area in the LA area

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

Alleged perpetrator(s) and perpetrator(s) are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases,

abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

#### 1.3 Related safeguarding policies

This policy is one of a series in the college integrated safeguarding portfolio and should be read and actioned in conjunction with the policies as listed below:

- The Single Central Record of identity, qualification, and vetting checks for all staff and volunteers
- The staff Safer recruitment and selection processes
- Local Authority policies and procedures on dealing with allegations against members of staff
- Acceptable Internet Use Policy & Agreement
- Staff Code of Behaviour
- Data Protection & GDPR Policy
- Admission & Attendance policy and Attendance Procedure
- Learner Behaviour policy
- Online Safety Policy
- Anti-Bullying Policy
- Anti-Cyber Bullying Policy
- Equality & Diversity Policy
- Confidentiality Policy
- Health and Safety Policy
- Accident & Emergency Procedure
- Whistleblowing Policy
- Lockdown policy

## 1.4 Policy compliance, monitoring and review

- KITE College will review this policy at least annually (as a minimum) and will update it as needed, so that it is kept up to date with safeguarding issues as they emerge and evolve, including lessons learnt. The policy will also be revised following any national or local updates, significant local or national safeguarding events and/or learning, and/or any changes to our own procedures.
- All staff (including temporary staff and volunteers) will be provided with a copy of this policy and Part One of KCSIE 2024 as appropriate. This will be shared with all staff during annual September CPD, with staff signing to confirm they have read the document, as well as being displayed on the safeguarding noticeboard.
- Parents/carers can obtain a copy of the college Child and Adult Protection and Safeguarding Policy and other related policies on request. Additionally, our policies can be viewed via the College website
- The policy forms part of our college development plan and will be reviewed annually by the principal, leadership team and trustees.
- The Designated Safeguarding Lead/Principal will ensure regular reporting on safeguarding activity and systems to the trustees.

# 1.5 Equality Statement

Some children and young people have an increased risk of abuse, both online and offline, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-

discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face. We give special consideration to children who:

- Have special educational needs and/or disabilities (SEND) or health conditions
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after
- Are missing or absent from education for prolonged periods and/or repeat occasions
- Whose parent/carer has expressed an intention to remove them from college to be home educated.

# 2. Key Responsibilities

## 2.1 Trustees and Leadership Team

The trustees have a strategic responsibility for our safeguarding arrangements and will comply with their duties under legislation. The trustees have regard to the KCSIE 2024 guidance and will ensure our policies, procedures and training is effective and complies with the law at all times.

The trustees will facilitate a whole college approach to safeguarding which involves everyone. They will ensure that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development, so that all systems, processes, and policies operate with the best interests of the child at their heart.

The trustees are aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, (including the Public Sector Equality Duty), and the local multi-agency safeguarding arrangements set out by the Kent Safeguarding Children Multi-Agency Partnership (KSCMP).

The trustees and leadership team will ensure that there are policies and procedures in place to ensure appropriate action is taken in a timely manner to safeguard and promote learner's welfare.

The principal will ensure that our child protection and safeguarding policies and procedures adopted by the trustees, are understood, and followed by all staff.

The principal will ensure that all staff (including temporary staff) and volunteers are informed of our systems with support safeguarding, including this policy, as part of their induction

The principal will ensure that all staff (including temporary staff) understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect.

The principal will communicate this policy to parents/carers when their child joins the college and via the college website.

The principal will make decisions regarding all low-level concerns.

The trustees will ensure that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent.

The trustees will ensure an appropriate senior member of staff, from the college leadership team, is appointed to the role of designated safeguarding lead. The trustees and leadership team will ensure that the DSL is supported in their role and is provided with sufficient time so they can provide appropriate support to staff and children regarding any safeguarding and welfare concerns.

The College has a nominated trustee for safeguarding. The nominated trustee will support the DSL and have oversight in ensuring that the college has an effective policy which interlinks with other related policies, that locally agreed procedures are in place and being followed, and that the policies are reviewed at least annually and when required.

The principal will act as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate

#### 2.2 Designated Safeguarding Lead (DSL)

The DSL is a member of the senior leadership team. Our DSL is Sarah Miller (Principal). The DSL takes lead responsibility for child protection and wider safeguarding in the college. This includes online safety and understanding our filtering and monitoring processes on school devices and school networks to keep pupils safe online.

During term time, the DSL will be available during college hours for staff to discuss any safeguarding concerns. Out of college hours the DSL can be contacted via email. When the DSL is absent, the deputies will act as cover.

Details are available on the Safeguarding Poster. In the unlikely events of the DSL and deputies being unavailable, Nic Petri, Safeguarding Trustee, will act as cover.

It is the role of the DSL and DDSLs to carry out their functions as identified in Annex C of KCISE 2023. This includes but is not limited to:

- Acting as the central contact point for all staff to discuss any safeguarding concerns.
- Maintaining a confidential recording system for safeguarding and child protection concerns o Coordinating safeguarding action for individual children.
- When supporting children with a social worker or looked after children, the DSL should have the details of the child's social worker and the name of the virtual school head in the authority that looks after the child, with the DSL liaising closely with the designated teacher.
- Liaising with other agencies and professionals in line with KCSIE 2024 and WTSC 2018
- Ensuring that locally established procedures as put in place by the three safeguarding partners as part of the Kent Safeguarding Children Multi-Agency Partnership (KSCMP) procedures, including referrals, are followed, as necessary.
- Representing, or ensure the college is appropriately represented at multi-agency safeguarding meetings (including child protection conferences).
- Managing and monitoring the college role in any multi-agency plan for a child.
- Being available during term time (during college hours) for staff in the college to discuss any safeguarding concerns.
- Helping promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and college leadership staff.
- Ensuring adequate and appropriate DSL cover arrangements in response to any closures and out of hours and/or out of term activities.

- Ensuring all staff access appropriate safeguarding training and relevant updates in line with the recommendations within KCSIE.
- As the principal, be aware of any safeguarding issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This includes being aware of the requirement for children to have an Appropriate Adult (PACE Code C 2019).

The DSL will undergo appropriate and specific training to provide them with the knowledge and skills required to carry out their role. Deputy DSLs will be trained to the same standard as the DSL. The DSLs' training will be updated formally at least every two years, but their knowledge and skills will be updated through a variety of methods at regular intervals and at least annually. The DSL will be given the time, funding, training, resources and support to:

- Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
- Have a good understanding of harmful sexual behaviour
- Have a good understanding of the filtering and monitoring systems and processes in place The full responsibilities of the DSL and deputies are set out in their job description.

#### 2.3 Members of staff

Our staff play a particularly important role in safeguarding as they are in a position to identify concerns early, provide help for learners, promote learner's welfare and prevent concerns from escalating.

#### All staff will:

- Read and understand part 1 and annex B of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education, and review this guidance at least annually
- Sign a declaration each academic year to say that they have reviewed the guidance
- Reinforce the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask learners to do online (e.g. sites they need to visit or who they'll be interacting with online)
- Provide a safe space for learners who are LGBTQ+ to speak out and share their concerns
- All members of staff will be aware of:
  - Our systems which support safeguarding, including this child protection and safeguarding policy,
    the staff code of conduct, the role and identity of the designated safeguarding lead (DSL) and
    deputies, the behaviour policy, online safety which includes the expectations, applicable roles and
    responsibilities in relation to filtering and monitoring, and the safeguarding response to children
    who go missing from education
  - The early help assessment process and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
  - The process for making referrals to local authority children's social care and for statutory
    assessments that may follow a referral, including the role they might be expected to play
  - What to do if they identify a safeguarding issue or a learner tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals

- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- The fact that children can be at risk of harm inside and outside of their home, at school and online
- The fact that children who are (or who are perceived to be) lesbian, gay, bi or gender questioning (LGBGQ+) can be targeted by other children and Young People.
- What to look for to identify children and YP who need help or protection

# 2.4 Children and young people

- Children and young people have a right to:
- Feel safe, be listened to, and have their wishes and feelings taken into account.
- Confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.
- Contribute to the development of college safeguarding policies.
- Receive help from a trusted adult.
- Learn how to keep themselves safe, including online.

#### 2.5 Parents and carers

Parents/carers have a responsibility to:

- Understand and adhere to the relevant college policies and procedures.
- Talk to their children about safeguarding issues and support the College in their safeguarding approaches.
- Identify behaviours which could indicate that their child is at risk of harm including online.
- Seek help and support from the College or other agencies.

#### 2.6 Trustee Board

The trustee board will:

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

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

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

Appoint a senior trustee level (or equivalent) lead to monitor the effectiveness of this policy in conjunction with the full trustee board. This is always a different person from the DSL.

Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners.

Ensure that the College has appropriate filtering and monitoring systems in place and review their effectiveness. This includes:

- Making sure that the leadership team and staff are aware of the provisions in place, and that they
  understand their expectations, roles and responsibilities around filtering and monitoring as part of
  safeguarding training
- Reviewing the DfE's filtering and monitoring standards, and discussing with IT staff and service
  providers what needs to be done to support the school in meeting these standards

#### Make sure:

- The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
- Online safety is a running and interrelated theme within the whole-college approach to safeguarding and related policies
- The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place
- The college has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors).

Appendix 1 of this policy covers this procedure.

That this policy reflects that children with SEND, or certain medical or physical health conditions,
 can face additional barriers to any abuse or neglect being recognised

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

- Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
- Make sure there are arrangements for the body to liaise with the college about safeguarding arrangements, where appropriate
- Make sure that safeguarding requirements are a condition of using the college premises, and that
  any agreement to use the premises would be terminated if the other body fails to comply The chair
  of the trustee board will act as the 'case manager' in the event that an allegation of abuse is made
  against the principal, where appropriate. All trustees will read Keeping Children Safe in Education in
  its entirety.

#### 3. Child Protection Procedures

# 3.1 Recognising indicators of abuse and neglect

Staff will maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a learner, staff will always act in the best interests of the learner.

All staff are made aware of the definitions and indicators of abuse and neglect as identified by Working Together to Safeguard Children (2018) and Keeping Children Safe in Education 2023. This is outlined locally within the Kent Support Levels Guidance.

KITE College recognise that when assessing whether a learner may be suffering actual or potential harm there are four categories of abuse (for more in-depth information, see appendix 1):

- Physical abuse
- Sexual abuse
- Emotional abuse
- Neglect

By understanding the indicators or abuse and neglect, we can respond to problems as early as possible and provide the right support and services for the learner and their family.

All members of staff are expected to be aware of and follow the below approach if they are concerned about a learner: 'What to do if you are worried a child is being abused' 2015.

KITE College recognises that concerns may arise in many different contexts and can vary greatly in terms of their nature and seriousness. The indicators of child abuse and neglect can vary from learner to learner. Children develop and mature at different rates, so what appears to be worrying behaviour for a younger child might be normal for an older child. It is important to recognise that indicators of abuse and neglect do not automatically mean a learner is being abused however all concerns should be taken seriously and will be explored by the DSL on a case-by-case basis.

KITE College recognises abuse, neglect, and safeguarding issues are rarely standalone events and cannot always be covered by one definition or one label alone. In many cases, multiple issues will overlap with one another, therefore staff will always be vigilant and always raise concerns with a DSL.

Parental behaviours can indicate child abuse or neglect, so staff will be alert to parent-child interactions or concerning parental behaviours; this could include parents who are under the influence of drugs or alcohol or if there is a sudden change in their mental health.

Learners may report abuse happening to themselves, their peers or their family members. All reports made by learners to staff will be taken seriously and will be responded to in line with this policy.

Safeguarding incidents and/or behaviours can be associated with factors and risks outside the college. Learners can be at risk of abuse or exploitation in situations outside their families; extrafamilial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, sexual abuse, serious youth violence and county lines.

KITE College recognises that technology can be a significant component in many safeguarding and wellbeing issues; learners are at risk of abuse online from people they know (including other young people) and from people they do not know; in many cases, abuse will take place concurrently via online channels and in daily life.

KITE College recognises that some learners have additional or complex needs and may require access to intensive or specialist services to support them.

Following a concern about a learner's safety or welfare, the searching and screening of learner's and confiscation of any items, including any electronic devices, will be managed in line with the college behaviour policy which is informed by the DfE 'Searching, screening and confiscation at school' guidance.

- The DSL (or deputy) will be informed of any need for searching where there were reasonable
  grounds to suspect a learner was in possession of a prohibited item as listed in our behaviour
  policy. The DSL (or deputy) will then consider the circumstances of the learner who has been
  searched to assess the incident against any potential wider safeguarding concerns.
- Staff will involve the DSL (or deputy) without delay if they believe that a potential search has revealed a safeguarding risk.

# 3.2 Responding to child protection concerns

If staff are made aware of a child protection concern, they are expected to:

- listen carefully to child, reflecting back the concern.
- use the learner's language.
- be non-judgmental.
- avoid leading questions; only prompting the learner where necessary with open questions to clarify information where necessary. For example who, what, where, when or Tell, Explain, Describe

- not promise confidentiality as concerns will have to be shared further, for example, with the DSL and potentially Integrated Children's Services.
- be clear about boundaries and how the report will be progressed.
- record the concern using the facts as the learner presents them, in line with college record keeping requirements via My Concern.
- inform the DSL (or deputy), as soon as practically possible.

If staff have any concerns about a learner's welfare, they are expected to act on them immediately. If staff are unsure if something is a safeguarding issue, they will speak to the DSL (or deputy).

The DSL or a deputy should always be available to discuss safeguarding concerns. If in exceptional circumstances, a DSL is not available, this should not delay appropriate action being taken by staff. Staff should speak to a member of the senior leadership team, take advice from the Education Safeguarding Service or a consultation with a social worker from the Front Door. In these circumstances, any action taken will be shared with a DSL as soon as is possible.

All staff are made aware that early information sharing is vital for the effective identification, assessment, and allocation of appropriate service provision, whether this is when problems first emerge, or where a child is already known to other agencies. Staff will not assume a colleague, or another professional will act and share information that might be critical in keeping children safe.

KITE College will respond to safeguarding concerns in line with the Kent Safeguarding Children Multi-Agency Partnership procedures (KSCMP).

• The full KSCMP procedures and additional guidance relating to reporting concerns and specific safeguarding issues can be found on their website: <a href="https://www.kscmp.org.uk">www.kscmp.org.uk</a>

In Kent, Early Help and Preventative Services and Children's Social Work Services are part of Integrated Children's Services (ICS). Specific information and guidance to follow with regards to accessing support and/or making referrals in Kent can be found here: www.kelsi.org.uk/support-forchildren-and-young-people/integrated-childrens-services

Where it is identified a child may benefit from Early Help support (as provided by ICS, the DSL (or deputy) will generally lead as appropriate and make a request for support via the Front Door.

The DSL will keep all Early Help cases under constant review and consideration will be given to
escalating concerns to the Front Door or seeking advice via the Education Safeguarding Service if
the situation does not appear to be improving or is getting worse.

All staff are made aware of the process for making referrals to Integrated Children's Services and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments.

Where a child is suffering, or is likely to suffer from harm, or is in immediate danger (for example, under section 17 or 47 of the Children Act), a 'request for support' will be made immediately to Kent Integrated Children's Services (via the 'Front Door') and/or the police, in line with KSCMP procedures.

- KITE College recognise that in situations where there are immediate child protection concerns for a
  child as identified in line with Support Level Guidance, it is NOT to investigate as a single agency,
  but to act in line with KSCMP guidance which may involve multi-agency decision making.
- The DSL may seek advice or guidance from an Area Education Safeguarding Advisor from the Education Safeguarding Service before deciding next steps.
- They may also seek advice or guidance from a social worker at the Front Door service who are the first point of contact for Integrated Children's Services (ICS).

In the event of a request for support to the Front Door being necessary, parents/carers will be informed and consent to this will be sought by the DSL in line with guidance provided by KSCMP and ICS. Parents/carers will be informed of this, unless there is a valid reason not to do so, for example, if to do so would put a child at risk of harm or would undermine a criminal investigation.

If, after a request for support or any other planned external intervention, a child's situation does not appear to be improving, or concerns regarding receiving a decision or the decisions made, staff or the DSL will re-refer (if appropriate) and/or DSLs will follow the KSCMP escalation procedures to ensure their concerns have been addressed and, most importantly, that the child's situation improves. DSLs may request support with this via the Education Safeguarding Service.

## 3.3 Recording concerns

All safeguarding concerns, discussions, decisions, and reasons for those decisions, will be recorded in writing on the college safeguarding system My Concern and passed without delay to the DSL. Our records will include a clear and comprehensive summary of any concerns, details of how concerns were followed up and resolved, and a note of any action taken, decisions reached and outcomes.

Incident/Welfare concerns are kept on My Concern.

Records will be completed as soon as possible after the incident/event, using the learner's words and will be signed and dated by the member of staff. Child protection records will record facts and not personal opinions. A body map will be completed if visible injuries have been observed.

If there is an immediate safeguarding concern the member of staff will consult with a DSL before completing the form as reporting urgent concerns takes priority.

If members of staff are in any doubt about recording requirements, they will discuss their concerns with the DSL.

Child protection records will include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved and details regarding any action taken, decisions reached and the outcome.

Child protection records will be kept confidential and stored securely. Child protection records will be kept for individual children and will be maintained separately from all other records relating to the learner in the college. Child protection records are kept in accordance with data protection legislation and are retained centrally and securely by the DSL.

All child protection records will be transferred in accordance with data protection legislation to the child's subsequent education provider, under confidential and separate cover as soon as possible; within 5 days for an in-year transfer or within the first 5 days of the start of a new term. Child protection files will be transferred securely to the new DSL, separately to the child's main file, and a confirmation of receipt will be obtained.

In addition to the child protection file, the DSL will also consider if it would be appropriate to share any information with the DSL at the new school or college in advance of a learner leaving, for example, information that would allow the new school or college to continue to provide support.

Where the college receives child protection files from another setting, the DSL will ensure key staff such as the named person with oversight for SEN, will be made aware of relevant information as required.

Where a learner joins the college and no child protection files are received, the DSL will proactively seek to confirm from the previous setting whether any child protections exist for the learner, and if so, if the files have been sent.

#### 3.4 Multi-agency working

KITE College recognises the pivotal role we have to play in multi-agency safeguarding arrangements and is committed to its responsibility to work within the KSCMP multi-agency safeguarding arrangements as identified within 'Working Together to Safeguard Children'.

The College leadership team, trustees and DSL will work to establish strong and cooperative local relationships with professionals in other agencies, including the safeguarding partners in line with local and national guidance.

KITE College recognises the importance of multi-agency working and is committed to working alongside partner agencies to provide a coordinated response to promote children's welfare and protect them from harm. This includes contributing to KSCMP processes as required, such as, participation in relevant safeguarding multi-agency plans and meetings, including Child Protection Conferences, Core Groups, Strategy Meetings, Child in Need meetings or other early help multiagency meetings.

The college will allow access for Kent Children's Social Work Service and, where appropriate, from a placing local authority, to conduct, or to consider whether to conduct, a section 17 or a section 47 assessment.

The principal/DSL are aware of the requirement for children to have an Appropriate Adult (PACE Code C 2019) where there is a need for detention, treatment and questioning by police officers and will respond to concerns in line with our college behaviour policy, which is informed by the DfE 'Searching, screening and confiscation at school' guidance.

# 3.5 Confidentiality and information sharing

KITE College recognises our duty and powers to hold, use and share relevant information with appropriate agencies in matters relating to child protection at the earliest opportunity as per statutory guidance outlined within KCSIE.

KITE College has an appropriately trained Data Protection Officer (DPO) as required by the UK General Data Protection Regulations (UK GDPR) to ensure that our college is compliant with all matters relating to confidentiality and information sharing requirements. The DPO at KITE College is Angela White.

Staff will have due regard to the relevant data protection principles, which allow them to share and withhold personal information. The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children (KCSIE 2024). KCSIE 2024, the Information Commissioner's Office the (ICO) and the DfE 'Information sharing advice for safeguarding practitioners' (2018) guidance provides further details regarding information sharing principles and expectations.

The principal/DSL will disclose relevant safeguarding information about a learner with staff on a 'need to know' basis.

All members of staff must be aware that whilst they have duties to keep information confidential, in line with our confidentiality procedures. Staff also have a professional responsibility to be proactive in sharing information as early as possible to help identify, assess, and respond to risks or concerns about the safety and welfare of children; this may include sharing information with the DSL and with other agencies as appropriate.

In regard to confidentiality and information sharing staff will only involve those who need to be involved, such as the DSL (or a deputy) and Kent Integrated Children's Services. All staff are aware they cannot promise a learner that they will not tell anyone about a report of any form of abuse, as this may not be in the best interests of the learner.

#### 3.6 Complaints

All members of the College community should feel able to raise or report any concerns about learner safety or potential failures in the college safeguarding regime. The college has a complaints procedure available to parents, learners and members of staff and visitors who wish to report concerns or complaints. This can be found on the website and safeguarding notice board.

Whilst we encourage members of our community to report concerns and complaints directly to us, we recognise this may not always be possible. Children, young people, and adults who have experienced abuse at college can contact the NSPCC 'Report Abuse in Education' helpline on 0800 136 663 or via email: help@nspcc.org.uk

Staff can also access the NSPCC whistleblowing helpline if they do not feel able to raise concerns regarding child protection failures internally. o Staff can call 0800 028 0285 (8:00 AM to 8:00 PM Monday to Friday) or email help@nspcc.org.uk.

The leadership team at KITE College will take all concerns reported to the College seriously and all complaints will be considered and responded to in line with the relevant and appropriate process. o Anything that constitutes an allegation against a member of staff or volunteer will be dealt with in line with section 8 of this policy.

# 4. Specific Safeguarding Issues

KITE College is aware of the range of specific safeguarding issues and situations that can put learners at greater risk of harm. In addition to Part one, DSLs, college leaders and staff who work will read Annex B of KCSIE 2024 which contains important additional information about specific forms of abuse and safeguarding issues.

Where staff are unsure how to respond to specific safeguarding issues, they should follow the processes as identified in part 3 of this policy and speak with the DSL or a deputy.

#### 4.1 Child-on-child abuse

All members of staff at KITE College recognise that children can abuse other children (referred to as child-on-child abuse, previously known as 'peer-on-peer' abuse), and that it can happen both inside and outside of college and online.

KITE College recognises that child-on-child abuse can take many forms, including but not limited to: Bullying, including cyberbullying, prejudice-based and discriminatory bullying/.

- Abuse in intimate personal relationships between children and young adults.
- Physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- Sexual violence and sexual harassment
- Consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Upskirting (which is a criminal offence), which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm o Initiation/hazing type violence and rituals.

Any allegations of child-on-child abuse will be recorded, investigated, and dealt with in line with this child and adult protection and safeguarding policy and KCSIE 2024 (in particular, part two and five).

KITE College adopts a zero-tolerance approach to child-on-child abuse. We believe that abuse is abuse and it will never be tolerated or dismissed as "just banter", "just having a laugh", "part of growing up" or "boys being boys"; this can lead to a culture of unacceptable behaviours and can create an unsafe environment for children and a culture that normalises abuse, which can prevent children from coming forward to report it.

All staff have a role to play in challenging inappropriate behaviours between children. Staff recognise that some child-on-child abuse issues may be affected by gender, age, ability and culture of those involved. For example, for gender-based abuse, girls are more likely to be victims and boys more likely to be perpetrators.

KITE College recognises that even if there are no reported cases of child-on-child abuse, such abuse is still likely to be taking place and it may be the case that it is just not being reported. As such, it is important that staff speak to the DSL (or deputy) about any concerns regarding child-on-child abuse.

In order to minimise the risk of child-on-child abuse, KITE College will:

• Implement a robust anti-bullying policy, provide an age/ability/need appropriate PSHE and RSE curriculum, provide a range of reporting mechanisms.

KITE College want learners to feel able to confidently report abuse and know their concerns will be treated seriously. All allegations of child-on-child abuse will be reported to the DSL and will be recorded, investigated, and dealt with in line with associated college policies, including child protection, antibullying, and behaviour. Learners who experience abuse will be offered appropriate support, regardless of where the abuse takes place.

Concerns about learners' behaviour, including child-on-child abuse taking place offsite will be responded to as part of a partnership approach with pupils/students' and parents/carers. Offsite behaviour concerns will be recorded and responded to in line with existing appropriate policies, for example anti-bullying, acceptable use, behaviour and child protection policies.

Alleged victims, alleged perpetrators and any other child affected by child-on-child abuse will be supported by:

 taking reports seriously, listening carefully, avoiding victim blaming, providing appropriate pastoral support, working with parents/carers, reviewing educational approaches, following procedures as identified in other policies, for example, the college anti-bullying, behaviour and child protection policy, and where necessary and appropriate, informing the police and/or ICS.

#### 4.2 Child-on-child sexual violence and sexual harassment

When responding to concerns relating to child-on-child sexual violence or harassment, KITE College will follow the guidance outlined in Part five of KCSIE 2024.

KITE College recognises that sexual violence and sexual abuse can happen anywhere, and all staff will maintain an attitude of 'it could happen here.' KITE College recognises sexual violence and sexual harassment can occur between two children of any age and sex. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children and can occur online and face to face (both physically and verbally). Sexual violence and sexual harassment is never acceptable.

All victims of sexual violence or sexual harassment will be reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. A victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment, or ever be made to feel ashamed for making a report.

Abuse that occurs online or outside of the College will not be dismissed or downplayed and will be treated equally seriously and in line with relevant policies/procedures, for example anti-bullying, behaviour, child protection, online safety.

KITE College recognises that the law is in place to protect children and young people rather than criminalise them, and this will be explained in such a way to learners that avoids alarming or distressing them.

KITE College recognises that an initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory, so children and young people may not be able to recall all details or timeline of abuse. All staff will be aware certain children may face additional barriers to telling someone, for example because of their vulnerability, disability, sex, ethnicity, and/or sexual orientation.

The DSL/DDSLs are likely to have a complete safeguarding picture and will be the most appropriate person to advise on the initial response.

- The DSL will make an immediate risk and needs assessment which will be considered on a case-bycase basis which explores how best to support and protect the victim and the alleged perpetrator,
  and any other children involved/impacted, in line with part five of KCSIE 2024 and relevant
  local/national guidance and support, for example KSCMP procedures and support from the
  Education Safeguarding Service.
- The risk and needs assessment will be recorded and kept under review and will consider the victim (especially their protection and support), the alleged perpetrator, and all other children, adult learners, and staff and any actions that are required to protect them.
- Any concerns involving an online element will take place in accordance with relevant local/national guidance and advice.
- Reports will initially be managed internally by the College and where necessary will be referred to Integrated Children's Services (Early Help and/or Children's Social Work Service) and/or the police. Important considerations which may influence this decision include:
- the wishes of the victim in terms of how they want to proceed.
- the nature of the alleged incident(s), including whether a crime may have been committed and/or whether Harmful Sexual Behaviour has been displayed.
- the ages of the children involved.
- the developmental stages of the children involved.
- any power imbalance between the children.
- if the alleged incident is a one-off or a sustained pattern of abuse sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature.
- that sexual violence and sexual harassment can take place within intimate personal relationships between children.
- understanding intra familial harms and any necessary support for siblings following incidents.
- whether there are any ongoing risks to the victim, other learners, children, or college staff.
- any other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

The college will in most instances engage with both the victim's and alleged perpetrator's parents/carers when there has been a report of sexual violence; this might not be necessary or proportionate in the case of sexual harassment and will depend on a case-by-case basis. The exception to this is if there is a reason to believe informing a parent/carer will put a child at additional risk. Any information shared with parents/carers will be in line with information sharing expectations, our confidentiality policy, and any data protection requirements, and where they are involved, will be subject to discussion with other agencies (for

example Children's Social Work Service and/or the police) to ensure a consistent approach is taken. o If DSLs are unsure how to proceed, advice will be sought from the Education Safeguarding Service.

# 4.3 Nude and/or semi-nude image sharing by children

The term 'sharing nudes and semi-nudes' is used to mean the sending or posting of nude or semi-nude images, videos or live streams of/by young people under the age of eighteen. Creating and sharing nudes and semi-nudes of under-18s (including those created and shared with consent) is illegal which makes responding to incidents complex. The UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people' guidance outlines how schools and colleges should respond to all incidents of consensual and non-consensual image sharing; it has been read by the safeguarding team at KITE College.

KITE College recognises that consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as youth produced/involved sexual imagery or "sexting") can be a safeguarding issue; all concerns will be reported to and dealt with by the DSL/DDSLs.

When made aware of concerns involving consensual and non-consensual sharing of nudes and semi-nude images and/or videos by children, staff are advised:

- to report any concerns to the DSL immediately.
- never to view, copy, print, share, forward, store or save the imagery, or ask a child to share or download it – this may be illegal. If staff have already inadvertently viewed imagery, this will be immediately reported to the DSL.
- not to delete the imagery or ask the child to delete it.
- to avoid saying or doing anything to blame or shame any children involved.
- to reassure the child(ren) involved and explain that the DSL will be informed so they can receive appropriate support and help. Do not promise confidentiality, as other agencies may need to be informed and be involved.
- not to investigate or ask the child(ren) involved to disclose information regarding the imagery o to
  not share information about the incident with other members of staff, children/young people, or
  parents/carers, including the families and child(ren) involved in the incident; this is the
  responsibility of the DSL.

DSLs will respond to concerns in line with the non-statutory UKCIS guidance: 'Sharing nudes and seminudes: advice for education settings working with children and young people' and the local KSCMP guidance. When made aware of a concern involving consensual and non-consensual sharing of nudes and semi-nude images and/or videos:

The DSL will hold an initial review meeting to explore the context and ensure appropriate and proportionate safeguarding action is taken in the best interests of any child involved. This may mean speaking with relevant staff and the children involved as appropriate.

Parents/carers will be informed at an early stage and be involved in the process to best support children, unless there is good reason to believe that involving them would put a child at risk of harm.

All decisions and action taken will be recorded in line with our child protection procedures.

If the incident involves a young adult (over 18).

Where a learner is over 18, careful consideration will be given to context. Given that many of the learners have social and communication issues and difficulties in understanding appropriate boundaries there are several considerations.

- DSL's meet with learners and discuss with parents and a judgement will be made in terms of experimental/age appropriateness versus intent to cause harm. A view will be taken on whether the sharing of images was consensual.
- Should the incident be classed as experimental.
- In the FIRST instance an educational/supportive approach will be taken, legal guidance will be shared with learners and families. However, learners will be advised that subsequent occurrences may result in reports made to Police and other external agencies.
- PHSE sessions group and individual will be carried out to ensure all learners understand legalities.

A referral will be made to ICS and/or the police immediately if:

A learner of 18 years or over intended to cause harm and the incident was malicious/without consent.

- there is reason to believe that a child has been coerced, blackmailed, or groomed, or there are concerns about their capacity to consent, for example, age of the child or they have special educational needs.
- the image/videos involve sexual acts and a child under the age of thirteen, depict sexual acts which are unusual for the child's developmental stage, or are violent.
- a child is at immediate risk of harm owing to the sharing of nudes and semi-nudes.

The DSL may choose to involve other agencies at any time if further information/concerns are disclosed at a later date.

If DSLs are unsure how to proceed, advice will be sought from the Education Safeguarding Service.

# 4.4 Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

KITE College recognises that both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

KITE College recognises that children can become trapped in CCE as perpetrators can threaten victims and their families with violence or entrap and coerce them into debt. Children involved in criminal exploitation often commit crimes themselves which can mean their vulnerability as victims is not always recognised (particularly older children) and they are not treated as victims, despite the harm they have experienced. The experience of girls who are criminally exploited can also be very different to that of boys. We also recognise that boys and girls being criminally exploited may be at higher risk of child sexual exploitation (CSE).

KITE College recognises that CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge, for example through others sharing videos or images of them on social media. CSE can affect any child who has been coerced into engaging in sexual activities and includes 16-and 17-year-olds who can legally consent to have sex. Some children may not realise they are being exploited, for example they may believe they are in a genuine romantic relationship.

If staff are concerned that a child may be at risk of CSE or CCE, immediate action should be taken by speaking to the DSL or a deputy.

#### 4.5 Serious violence

All staff are aware of the indicators which may signal children are at risk from or are involved with serious violent crime. These may include unexplained gifts or new possessions, increased absence from college, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of CCE.

Any concerns regarding serious violence will be reported and responded to in line with other child protection concerns by speaking with a DSL or DDSLs. The initial response to victims is important and staff will take any allegations seriously and work in ways that support children and keep them safe.

## 4.6 So-called Honour Based Abuse (HBA)

So-called 'honour'-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of HBA are abuse, regardless of the motivation, and concerns will be responded to in line with section 3 of this policy. Staff will report any concerns about HBA to the DSL. If there is an immediate threat, the police will be contacted.

Whilst all staff will speak to the DSL with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers.

• If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police. This duty applies to qualified teachers, however at KITE College we will ensure that any staff member alerts the Principal/DSL whom has qualified teacher status and will report to the police.

#### 4.7 Extremism

KITE College is aware of our duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), to have "due regard to the need to prevent people from being drawn into terrorism", also known as the Prevent duty and the specific obligations placed upon us as an education provider regarding risk assessments, working in partnership, staff training, and IT policies.

KITE College recognises that children are vulnerable to extremist ideology and radicalisation and staff will be alert to changes in children's behaviour which could indicate that they may be in need of help or protection.

Staff will report any concerns to the DSL, who is aware of the local procedures to follow. If there is an immediate threat, the police will be contacted via 999.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate

(see 'Referral' above). Inform the DSL as soon as practically possible after the referral.

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

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

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

- Think someone is in immediate danger
- Think someone may be planning to travel to join an extremist group
- See or hear something that may be terrorist related.

Prevent strategy and Risk assessment – see Appendix 5

#### 4.8 Cybercrime

KITE College recognises that children with particular skill and interest in computing and technology may inadvertently or deliberately stray into 'cyber-enabled' (crimes that can happen offline but are enabled at scale and at speed online) or 'cyber dependent' (crimes that can be committed only by using a computer/internet enabled device) cybercrime.

If staff are concerned that a child may be at risk of becoming involved in cyber-dependent cybercrime, the DSL will be informed, and consideration will be given to accessing local support and/or referring into the Cyber Choices programme, which aims to intervene when young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

Where there are concerns about 'cyber-enabled' crime such as fraud, purchasing of illegal drugs online, child sexual abuse and exploitation, or other areas of concern such as online bullying or general online safety, they will be responded to in line with the child protection and other appropriate policies.

#### 4.9 Domestic abuse

KITE College recognises that domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial, or emotional abuse. Children and adults can be victims of domestic abuse and may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). Domestic abuse can have a detrimental and long-term impact on children's health, well-being, development, and ability to learn.

If staff are concerned that a learner may be at risk of seeing, hearing, or experiencing domestic abuse in their home or in their own intimate relationships, immediate action should be taken by speaking to the DSL/DDSL.

#### 4.10 Mental Health

All staff recognise that mental health problems can, in some cases, be an indicator that a learner has suffered or is at risk of suffering abuse, neglect or exploitation.

Staff are aware that learner's experiences, for example where learners have suffered abuse and neglect, or other potentially traumatic Adverse Childhood Experiences (ACEs), can impact on their mental health, behaviour, and education.

Staff are well placed to observe learners day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

If staff have a mental health concern about a learner that is also a safeguarding concern, immediate action should be taken by speaking to the DSL.

#### 4.11 FGM

Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs". FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'. Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a learner may be at risk, are set out in appendix 3

of this policy.

#### Any tutor who either:

- Is informed by a girl under 18 that an act of FGM has been carried out on her; or
- Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth.
- Must immediately report this to the police, personally. This is a mandatory statutory duty, and tutors will face disciplinary sanctions for failing to meet it.
   Staff should not examine learners.
- Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children's social care as appropriate.

Any other member of staff who discovers that an act of FGM appears to have been carried out on a learner under 18 must speak to the DSL and follow our local safeguarding procedures. Any member of staff who suspects a learner is at risk of FGM or suspects that FGM has been carried out or discovers that a learner aged 18 or over appears to have been a victim of FGM should speak to the DSL and follow our local safeguarding procedures.

#### 5. Supporting Children and adults Potentially at Greater Risk of Harm

Whilst all learners should be protected, KITE College acknowledge that some groups of children are potentially at greater risk of harm. This can include the following groups:

# 5.1 Safeguarding children with Special Educational Needs or Disabilities (SEND)

KITE College acknowledges that learners with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges and barriers for recognising abuse and neglect.

KITE College recognises that learners with SEND may face additional communication barriers and experience difficulties in managing or reporting abuse or challenges. Learners will be supported to communicate and ensure that their voice is heard and acted upon.

All members of staff are encouraged to appropriately explore potential indicators of abuse such as behaviour, mood changes or injuries and not to assume that they are related to the child's disability. Staff will be mindful that learners with SEND or certain medical conditions may be disproportionally impacted by behaviours such as bullying, without outwardly showing any signs.

Members of staff are encouraged to be aware that learners with SEND can be disproportionally impacted by safeguarding concerns, such as exploitation, peer group isolation or bullying including prejudice-based bullying.

To address these additional challenges, our college will always consider implementing extra pastoral support and attention for children with SEND.

#### 5.2 Children requiring mental health support

KITE College has an important role to play in supporting the mental health and wellbeing of our pupils/students. Mental health problems can, in some cases, be an indicator that a learner has suffered or is at risk of suffering abuse, neglect or exploitation.

Where there are concerns regarding possible mental health problems for learners, staff should:

• Follow our processes for identifying possible mental health problems, alert the Tutor and keyworker, seek support from SLT and Mental Health Lead.

Age/ability appropriate education will be provided to our learners to help promote positive health, wellbeing, and resilience.

# 5.3 Children Missing from Education (CME)

Children missing from education, particularly persistently, can act as a vital warning sign to a range of safeguarding issues including neglect, sexual abuse, and child sexual and criminal exploitation - particularly county lines. A robust response to children missing from education will support the identification of such abuse and may help prevent the risk of children going missing in the future.

Where possible, the college will hold more than one emergency contact number for each learner, so we have additional options to make contact with a responsible adult if a child missing education is also identified as being a welfare and/or safeguarding concern.

Where the college have concerns that a child is missing from education, we will respond in line with our statutory duties (DfE: Children missing education) and local policies. Local support is available via the PRU, Inclusion and Attendance Service (PIAS).

#### 5.4 Elective Home Education (EHE)

Where a parent/carer expresses their intention to remove a child from college with a view to educating at home, we will respond in line with national Elective Home Education guidance and local Kent guidance. We will work together with parents/carers and other key professionals and organisations to ensure decisions are made in the best interest of the learner, in line with compulsory education age and needs of the learner.

#### 5.5 Children who need a social worker

The DSL will hold details of social workers working with children in the college so that decisions can be made in the best interests of the child's safety, welfare, and educational outcomes.

Where children and adults have a social worker, this will inform college decisions about their safety and promoting their welfare, for example, responding to unauthorised absence and provision of pastoral and/or academic support.

# 5.6 Looked after children, previously looked after children and care leavers

KITE College recognises the common reason for children becoming looked after is as a result of abuse and/or neglect and a previously looked after child also potentially remains vulnerable. KITE recognising the vital importance of working with parents and carers and are committed to work supportively and sensitively.

The College has appointed a 'designated teacher' who works with local authorities, including the Virtual School Kent (including the virtual school head), to promote the educational achievement of registered pupils who are looked after or who have been previously looked after.

The designated teacher will work with the DSL to ensure appropriate staff have the information they need in relation to a child's looked after legal status, contact arrangements with birth parents or those with parental responsibility, care arrangements and the levels of authority delegated to the carer by the authority looking after them. Where a child is looked after, the DSL will hold details of the social worker and the name of the virtual school head in the authority that looks after the child.

Where the College believe a child is being cared for as part of a private fostering arrangement (occurs when a child under 16 or 18 if the child is disabled is cared for and lives with an adult who is not a relative for 28 days or more) there is a duty to recognise these arrangements and inform the Local Authority via the Front Door.

Where a child is leaving care, the DSL will hold details of the local authority Personal Advisor appointed to guide and support them and will liaise with them as necessary regarding any issues of concern.

# 5.7 Children and Young People who are Lesbian, Gay, Bi, or Gender Questioning.

The fact that a child or a young person may be LGBGQ+ is not in itself an inherent risk factor for harm, however, KITE College recognises that children who are LGBGQI+ or are perceived by other children to be LGBQI+ (whether they are or not) can be targeted by other children or others within the wider community.

KITE College recognises risks can be compounded where children who are LGBGQI+ lack a trusted adult with whom they can be open. LGBGQ+ is included within our Relationships Education/ Relationship and Sex Education and Health Education curriculum and our staff will endeavour to reduce the additional barriers faced and provide a safe space for children to speak out or share any concerns.

# 5.8. Children with family members in prison

Approximately 200,000 children in England and Wales have a parent sent to prison each year.

KITE recognises these children and young people are at risk of poor outcomes including poverty, stigma, isolation and poor mental health.

# 6. Online Safety

KITE recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues. To address this, our college aims to:

Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of learners, staff, volunteers and trustees

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

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

Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate. The 4 key categories of risk and our approach to online safety is based on addressing the following categories of risk:

- Content being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism
- Contact being subjected to harmful online interaction with other users, such as 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 personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
- Commerce risks such as online gambling, inappropriate advertising, phishing and/or financial scams

To meet our aims and address the risks above, we will: Educate learners about online safety as part of our curriculum. For example:

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

Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyberbullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required and at least once each academic year.

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

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

• Staff are allowed to bring their personal phones to college for their own use, but will limit such use to non-contact time when learners are not present

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

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

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

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

Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems. Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community.

Provide regular safeguarding and children protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively.

Review the child and adult protection and safeguarding policy, including online safety, annually and the procedures and implementation are updated and reviewed regularly.

This section summarises our approach to online safety and mobile phone use. For full details about our policies in these areas, please refer to our online safety policy.

#### 6.1 Policies and procedures

The DSL has overall responsibility for online safety within the college but will liaise with other members of staff, as necessary.

The DSL will respond to online safety concerns in line with our child protection and other associated policies.

Internal sanctions and/or support will be implemented as appropriate.

Where necessary, concerns will be escalated and reported to relevant partner agencies in line with local policies and procedures.

KITE College uses a wide range of technology. This includes: computers, laptops, tablets and other digital devices, the internet, our learning platform, intranet and email systems.

All college owned devices and systems will be used in accordance with our acceptable use policies and with appropriate safety and security measures in place.

KITE College recognises the specific risks that can be posed by mobile and smart technology, including mobile/smart phones, cameras and wearable technology. In accordance with KCSIE 2024, KITE College has appropriate mobile and smart technology and image use policies in place, which are shared and understood by all members of the community.

## 6.2 Appropriate filtering and monitoring

KITE College will do all we reasonably can to limit children's exposure to online risks through college provided IT systems and will ensure that appropriate filtering and monitoring systems are in place.

All decisions will be informed in part by the risk assessment required by the Prevent Duty (See Appendix 6) and is formed based on the age/ability/need of our learners, the number of our learners, how often they access IT systems and the proportionality of costs vs risks. We have consulted the UK Safer Internet Centre which has published guidance as to what "appropriate" filtering and monitoring might look like.

If learners or staff discover unsuitable sites or material, they are required to: turn off monitor/screen, report the concern immediately to a member of staff who will escalate as appropriate.

Our leadership team and relevant staff have an awareness and understanding of the filtering and monitoring provisions in place, manage them effectively and know how to escalate concerns when identified.

All users will be informed that use of our systems can be monitored, and that monitoring will be in line with data protection, human rights, and privacy legislation.

Filtering breaches or concerns identified through our monitoring approaches will be recorded and reported to the DSL who will respond as appropriate.

Any access to material believed to be illegal will be reported immediately to the relevant agencies, such as the Internet Watch Foundation and the police.

When implementing appropriate filtering and monitoring, KITE College will ensure that "over blocking" does not lead to unreasonable restrictions as to what learners can be taught with regards to online teaching and safeguarding.

Whilst filtering and monitoring is an important part of our online safety responsibilities, it is only one part of KITE College's approach to online safety.

- Learners will use appropriate search tools, apps and online resources as identified by staff, following an informed risk assessment.
- Internet use will be supervised by staff as appropriate to learner's age/ability/need.

Learners will be directed to use age/ability appropriate online resources and tools by staff.

Information security and access management.

#### 6.3 Information and access management

- KITE College is responsible for ensuring an appropriate level of security protection procedures are in place, in order to safeguard our systems as well as staff and learners. Further information can be found in our information security, acceptable use and online safety policy.
- KITE College will review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies.

# 6.4 Remote/Online learning

KITE College will ensure any remote sharing of information, communication and use of online learning tools and systems will be in line with privacy and data protection requirements and any local/national guidance.

All communication with learners and parents/carers will take place using college provided or approved communication channels.

 Any pre-existing relationships or situations which mean this cannot be complied with will be discussed with the DSL.

Staff and learners will engage with remote teaching and learning in line with existing behaviour principles as set out in our college behaviour, code of conduct and Acceptable Use Policies

Staff and learners will be encouraged to report issues experienced at home and concerns will be responded to in line with our child protection and other relevant policies.

# 6.5 Staff training

KITE College will ensure that all staff, including volunteers and trustees, receive online safety training as part of induction and that ongoing online safety training and update for all staff will be integrated, aligned and considered as part of our overarching safeguarding approach.

# 6.6 Educating Learners

KITE College will ensure a comprehensive whole college curriculum response is in place to enable all learners to learn about and manage online risks effectively as part of providing a broad and balanced curriculum.

DSL/DDSLs and senior leaders have accessed the UK Council for Internet Safety (UKCIS) 'Education for a Connected World Framework' and DfE 'Teaching online safety in school' guidance.

# 6.7 Working with parents/carers

KITE College will build a partnership approach to online safety and will support parents/carers to become aware and alert of the potential benefits and risks and to reinforce the importance of children being safe online by:

 providing information on our college website and through existing communication channels (such as official social media, emails), offering specific online safety events for parents/carers and highlighting online safety at existing events

KITE College will ensure parents and carers understand what systems are used to filter and monitor their children's online use at college, what their children are being asked to do online, including the sites they will be asked to access and who from the college (if anyone) their child is going to be interacting with online. This is achieved by:

 providing information on our college website and relevant policies such as acceptable use, home/college agreements and through existing communication channels.

Where the college is made aware of any potentially harmful risks, challenges and/or hoaxes circulating online, national or locally, we will respond in line with the DfE 'Harmful online challenges and online hoaxes' guidance to ensure we adopt a proportional and helpful response. Additional local advice and support is available for DSLs and SLT via the Education Safeguarding Service: 'Think before you scare'.

# 7. Staff Engagement and Expectations

#### 7.1 Staff awareness, induction and training

All members of staff have been provided with a copy of part one of 'Keeping Children Safe in Education' 2023 which covers safeguarding information for staff.

- College leaders, including the DSL/DDSLs will read KCSIE in its entirety.
- College leaders and all members of staff will read annex B.
- All members of staff have signed to confirm that they have read and understood the national guidance shared with them.

All new staff and volunteers (including agency and third-party staff) receive safeguarding and child protection training (including online safety), including information to ensure they are aware of the college internal safeguarding processes, as part of their induction. This is achieved through induction training and eLearning. This training is regularly updated and is in line with advice from the safeguarding partners.

Designated trustees have received Safeguarding training that equips them with the knowledge to provide strategic challenge to test and assure that our safeguarding policies and procedures are effective and support the delivery of a robust whole college approach to safeguarding. This training is regularly updated.

All staff members (including agency and third-party staff) will receive appropriate child protection training (including online safety) to ensure they are aware of a range of safeguarding issues. This training will be updated at least annually. This will be achieved through annual September INSET.

The DSL and DDSLs will undertake child protection and safeguarding training at least every 2 years. In addition, they will update their knowledge and skills at regular intervals, and at least annually (for example through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

All staff undertake Prevent awareness training.

All trustees receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated. The chair of trustees also completes training in managing allegations.

Online safety training for staff will be integrated, aligned and considered as part of the whole college safeguarding approach and wider staff training and curriculum planning. This will be achieved through annual updates and eLearning.

In addition to specific child protection training, all staff will receive regular safeguarding and child protection updates, at least annually, to provide them with relevant skills and knowledge to safeguard children effectively. This will be achieved via email, e-bulletins, staff meetings and weekly CPD slots.

KITE College recognises the expertise staff build by undertaking safeguarding training and from managing safeguarding concerns on a daily basis and staff are encouraged to contribute to and shape college safeguarding arrangements and child protection policies. This will be achieved via input from knowledgeable and experienced staff, inviting input at staff meetings.

The College HR Manager will maintain an up to date record of safeguarding training and who has been trained.

## 7.2 Safer working practice

All members of staff are required to work within our clear guidelines on safer working practice as outlined in the College Behaviour policy and Staff Code of Behaviour.

• The Principal/DSL will ensure that all staff and volunteers (including agency and third-party staff) have read our child and adult protection policy and are aware of the college expectations regarding safe and professional practice via the code of staff behaviour and Acceptable Use Policy.

Staff will be made aware of the College behaviour management policy.

Staff will manage behaviour effectively to ensure a good and safe educational environment and will have a clear understanding of the needs of all children and young people.

All staff will be made aware of the professional risks associated with the use of social media and electronic communication (such as email, mobile phones, texting, social networking). Staff will adhere to relevant college policies including staff behaviour policy, mobile and smart technology, Acceptable Use Policies and social media.

# 7.3 Supervision and support

The induction process will include familiarisation with child and adult protection responsibilities and procedures to be followed if members of staff have any concerns about a learner's safety or welfare.

The college will provide appropriate supervision and support for all members of staff to ensure that:

- All staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children.
- All staff are supported by the DSL and DDSLs in their safeguarding role.

All members of staff have regular reviews of their own practice to ensure they improve over time.

Any member of staff affected by issues arising from concerns for learner's welfare or safety can seek support from the DSL.

The DSL will also put staff in touch with outside agencies for professional support if they so wish. Staff can also approach organisations such as their Union, the Education Support Partnership or other similar organisations directly.

# 8. Safer Recruitment and Allegations Against Staff

## 8.1 Safer recruitment and safeguarding checks

KITE College is committed to ensure that we develop a safe culture and that all steps are taken to recruit staff and volunteers who are safe to work with our learners and staff.

KITE College will follow relevant guidance in Keeping Children Safe in Education 2023 (Part Three, 'Safer Recruitment') and from The Disclosure and Barring Service (DBS)

The principal, trustees and leadership team are responsible for ensuring that the College follows safe recruitment processes as outlined within guidance.

The principal and trustees will ensure that at least one of the persons who conducts an interview has completed safer recruitment training.

The College maintains an accurate Single Central Record (SCR) in line with statutory guidance.

KITE College are committed to supporting the statutory guidance from the Department for Education on the application of the Childcare (Disqualification) Regulations 2009 and related obligations under the Childcare Act 2006 in schools and colleges.

We advise all staff to disclose any reason that may affect their suitability to work with children including convictions, cautions, court orders, reprimands, and warnings.

Where the College places a learner with an alternative provision provider, the College will continue to be responsible for the safeguarding of that child.

• The College will undertake appropriate checks to ensure the provider meets the needs of the learner, including written confirmation that appropriate safeguarding checks have been carried out on individuals working at the establishment.

Where the College organises work experience placements, we will follow the advice and guidance as identified in Part three of KCSIE 2024.

# 8.2 Allegations/concerns raised in relation to staff, including supply teachers, volunteers and contractors

Any concerns or allegations about staff will be recorded and dealt with appropriately in line with national (Part four of KCSIE 2024) and the local Kent allegations arrangements. In depth information can be found within our Staff Code of Behaviour.

Any concerns or allegations about staff will be recorded and dealt with appropriately in line with national (Part four of KCSIE) and local guidance. Ensuring concerns are dealt with effectively will protect those working in or on behalf of the College from potential false allegations or misunderstandings.

Where the principal is unsure how to respond, for example if the College is unsure if a concern meet the harm 'thresholds', advice will be sought via the Local Authority Designated Officer (LADO) Enquiry Line and/or the Education Safeguarding Service.

In all cases where allegations are made against staff or low-level concerns are reported, once proceedings have been concluded, the principal (and if they have been involved the LADO) will consider the facts and determine whether any lessons can be learned and if any improvements can be made.

#### 8.2.1 Concerns that meet the 'harm threshold'

KITE College recognises that it is possible for any member of staff, including volunteers, trustees, contractors, agency and third-party staff (including supply teachers) and visitors to behave in a way that indicates a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children in a school or college. This includes when someone has:

- behaved in a way that has harmed a child, or may have harmed a child
- possibly committed a criminal offence against or related to a child or behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

Allegations against staff which meet this threshold will be responded to and managed in line with part four of KCSIE. Allegations that meet the harm threshold will be referred immediately to the principal who will contact the LADO to agree further action to be taken in respect of the child and staff member. In the event of allegations of abuse being made against the principal/staff are advised that allegations should be reported to the chair of trustees or safeguarding trustee, who will contact the LADO.

#### 8.2.2 Concerns that do not meet the 'harm threshold'

KITE College may also need to take action in response to 'low-level' concerns about staff. Additional information regarding low-level concerns is contained with our staff code of conduct policy and Allegations against staff (including low-level concerns) policy — this includes what a low-level concern is, the importance of sharing them and the confidential procedure to follow when sharing them.

KITE College has an open and transparent culture in which all concerns about all adults working in or on behalf of the college are dealt with promptly and appropriately; this enables us to identify inappropriate, problematic or concerning behaviour early, minimise the risk of abuse and ensure that adults working in or on behalf of the college are clear about and act within appropriate professional boundaries, and in accordance with our ethos and values.

A 'low-level' concern does not mean that it is insignificant; a low-level concern is any concern that an adult working in or on behalf of the college may have acted in a way that is inconsistent with our staff code of conduct policy, including inappropriate conduct outside of work and does not meet the 'harm threshold' or is otherwise not serious enough to consider a referral to the LADO.

Low-level concerns may arise in several ways and from a number of sources. For example, suspicion, complaints, or allegations made by a child, parent or other adult within or outside of the organisation, or as a result of vetting checks.

It is crucial that all low-level concerns are shared responsibly, recorded and dealt with appropriately to protect staff from becoming the subject of potential false low-level concerns or misunderstandings.

Low-level concerns should be shared confidentially in line with our staff code of conduct to the Principal, or Chair of Trustees if the concern is regarding the principal.

- Where low-level concerns are reported to the College, the principal will be informed of all low-level concerns and is the ultimate decision maker in respect of the response to all low-level concerns.
- The principal will share concerns and liaise with the LADO enquiries officer via the LADO Enquiry Line.
- Low-level concerns shared about supply staff and contractors will be shared with their employers so any potential patterns of inappropriate behaviour can be identified. If the College is in any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, we will consult with the LADO.

- Low-level concerns will be recorded in writing via the Confide portal and reviewed so potential patterns of concerning, problematic or inappropriate behaviour can be identified.
- Records will be kept confidential and will be held securely and retained and in compliance with the
  Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR) and other
  relevant policies and procedures (for example data retention policies).
- Where a pattern is identified, the College will implement appropriate action, for example consulting with the LADO enquiry line and following our disciplinary procedures.

#### 8.3 Safe Culture

As part of our approach to safeguarding, the College has created and embedded a culture of openness, trust and transparency in which our values and expected behaviour as set out in our Staff Code of Behaviour are constantly lived, monitored and reinforced by all staff (including supply teachers, volunteers and contractors) and where all concerns are dealt with promptly and appropriately.

Staff are encouraged and should feel confident to self-refer, if they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards. This includes where concerns may be felt to be deliberately invented or malicious; such allegations are extremely rare and as such all concerns should be reported and recorded.

All staff and volunteers should feel able to raise any concerns about poor or unsafe practice and potential failures in the College safeguarding regime. The leadership team at KITE College will take all concerns or allegations received seriously.

All members of staff are made aware of the college Whistleblowing procedure, which can be found on our website and on the safeguarding notice board. It is a disciplinary offence not to report concerns about the conduct of a colleague that could place a child or young adult at risk.

Staff can access the NSPCC whistleblowing helpline if they do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285 (8:00 AM to 8:00 PM Monday to Friday) or email help@nspcc.org.uk • KITE College has a legal duty to refer to the Disclosure and Barring Service (DBS) anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity or would have been removed had they not left. The DBS will consider whether to bar the person. o If these circumstances arise in relation to a member of staff at our college, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the LADO.

# 9. Opportunities to teach Safeguarding

KITE College will ensure that children and adults are taught about safeguarding, including online safety, as part of providing a broad and balanced curriculum. This will include covering relevant issues through our Personal Development curriculum.

We recognise that the College plays an essential role in helping our learners to understand and identify the parameters of what is appropriate child and adult behaviour, what is 'safe,' to recognise when they and others close to them are not safe, and how to seek advice and support when they are concerned. Our curriculum provides opportunities for increasing self-awareness, self-esteem, social and emotional understanding, assertiveness and decision making so that learners have a range of age-appropriate contacts and strategies to ensure their own protection and that of others.

KITE College recognises the crucial role we have to play in preventative education. Preventative education is most effective in the context of a whole- college approach which prepares learners for life in modern

Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment.

KITE College has a clear set of values and standards, upheld and demonstrated throughout all aspects of college life which are underpinned by our behaviour policy and pastoral support system, as well as by a planned programme of evidence-based Personal Development delivered in regularly timetabled lessons and reinforced throughout the whole curriculum. Our programme is fully inclusive and developed to be age and stage of development appropriate.

KITE College recognise that a one size fits all approach will not be appropriate for all of our children and young people, and a more personalised or contextualised approach, tailored to the specific needs and vulnerabilities individuals might be needed, for example children who are victims of abuse.

Our college systems support learners to talk to a range of staff.

All children will be listened to and heard, and their concerns will always be taken seriously and acted upon as appropriate.

#### 10. Physical Safety

# 10.1 The use of premises by other organisations

Where services or activities are provided separately by another body using the college facilities/premises, the principal will seek written assurance that the organisation concerned has appropriate policies and procedures in place regarding safeguarding children and child protection, and that relevant safeguarding checks have been made in respect of staff and volunteers. If this assurance is not achieved, an application to use premises will be refused.

Safeguarding requirements will be included in any transfer of control agreement (such as a lease or hire agreement), as a condition of use and occupation of the premises. Failure to comply with this will lead to termination of the agreement.

# 10.2 Site security

All members of staff have a responsibility for maintaining awareness of buildings and grounds security and for reporting concerns that may come to light.

Appropriate checks will be undertaken in respect of visitors and volunteers coming into college as outlined within national guidance. Visitors will be expected to sign in and out via the office visitors log and to display a visitor's badge whilst on site.

Staff and visitors will be expected to adhere to any safety arrangements implemented.

Any individual who is not known or identifiable on site should be challenged for clarification and reassurance. The college expect learners to report concerns to staff.

The College will not accept the behaviour of any individual (parent or other) that threatens college security or leads others (child or adult) to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse access for that individual to the college site.

# 11. Local Support

All members of staff in KITE College are made aware of local support available.

Kent Safeguarding Children Multi-Agency Partnership (KSCMP)

kscmp@kent.gov.uk

#### www.kscmp.org.uk

03000 421126

Headquarters: Sessions House, County Hall, Maidstone, Kent ME14 1XQ

03000 42 31 69

Online Protection: Sessions House, County Hall, Maidstone Kent ME14 1XQ

03000 42 31 64

The **Local Authority Designated Officer (LADO)** deals with <u>allegations against staff</u> who work with children either in education or the wider workforce.

To contact the LADO Team please call 03000 41 08 88 or email <a href="mailto:kentchildrenslado@kent.gov.uk">kentchildrenslado@kent.gov.uk</a>.

#### **Prevent Education Officer**

South/East - Jill Allen jill.allen@kent.gov.uk 03000 413565

If you think a learner might be at risk of extremism, contact the helpline on 020 7340 7264 or counter.extremism@education.gov.uk

#### **Kent Police**

101 or 999 if there is an immediate risk of harm

#### **Social Services**

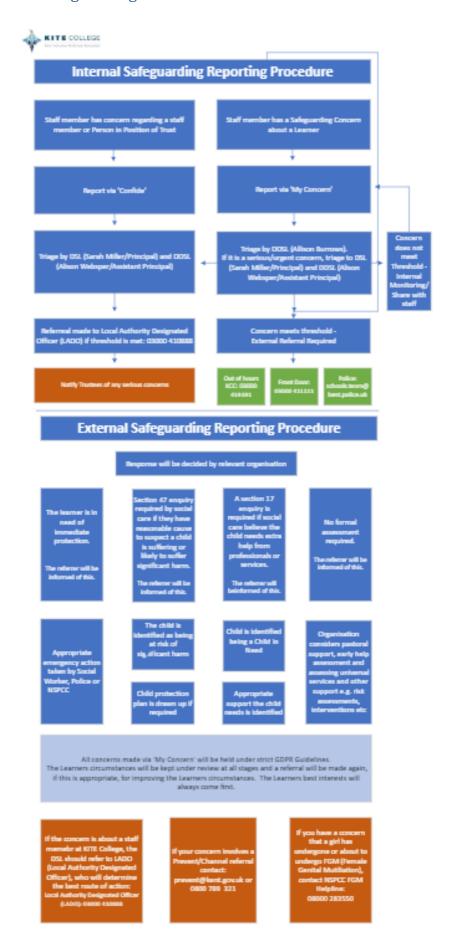
If a learner may be at risk of imminent harm, call the Integrated Front Door on 03000 411 111 (outside office hours - 03000 419 191)

#### **Adult Safeguarding**

Adult Social Care via 03000 41 61 61 (text relay 18001 03000 41 61 61)

or email <a href="mailto:social.services@kent.gov.uk">social.services@kent.gov.uk</a>

# Appendix 1-KITE Safeguarding Process



# **PREVENT and Safeguarding Team**



Nic Petri - Safeguarding Trustee

Ensures that the College is compliant with safeguarding policies, procedures and the law. Leads on governance and safeguarding. Ensures that the College's safeguarding training regime is robust



Sarah Miller – Principal/ SLT Designated Safeguarding Lead

Accountable for all Safeguarding matters across the college. Works in accordance with the requirements upon all College staff. Ensures that all safeguarding policies and procedures adopted by the governing body are followed by staff



Alison Websper SENCO and Deputy Head of College Deputy Safeguarding Lead

Role of the Designated Senior Person (DSP)-

Oversees all quality and good practice across all safeguarding. Carry out safeguarding audits annually and ensure policies are regularly reviewed and updated when needed. Monitor and report on all Safeguarding incidents and concerns.



Marie Sacre
Pastoral Support
Deputy Safeguarding
Lead

Role of the Deputy Safeguarding Lead-A Deputy Safeguarding Lead is trained to the same standard as the Safeguarding Lead. Duties can be delegate to appropriately trained deputies.



Helen Gooderson Pastoral Support Deputy Safeguarding Lead

#### Role of the Deputy Safeguarding Lead-

A Deputy Safeguarding Lead is trained to the same standard as the Safeguarding Lead. Duties can be delegate to appropriately trained deputies.



Lou Scott
Outreach Mentor
Deputy Safeguarding
Lead

#### Role of the Deputy Safeguarding Lead-

A Deputy Safeguarding
Lead is trained to the
same standard as the
Safeguarding Lead.
Duties can be delegate
to appropriately
trained deputies.

#### Appendix 3 Indicators of abuse

All staff should be aware that abuse, neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another.

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. They may be abused by an adult or adults or another child or children. It should be noted that abuse can be carried out both on and offline and be perpetrated by men, women, and children.

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. 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 (including via the internet).

#### Sexual abuse:

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. Signs that MAY INDICATE Sexual Abuse

- Sudden changes in behaviour and performance
- Displays of affection which are sexual and age inappropriate
- Self-harm, self-mutilation or attempts at suicide
- Alluding to secrets which they cannot reveal
- Tendency to cling or need constant reassurance
- Regression to younger behaviour for example thumb sucking, playing with discarded toys, acting like a baby
- Distrust of familiar adults, for example, anxiety of being left with relatives, a childminder or lodger
- Unexplained gifts or money
- Depression and withdrawal
- Fear of undressing for PE
- Sexually transmitted disease
- Fire setting

## 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.

Signs that MAY INDICATE physical abuse:

• Bruises and abrasions around the face

- Damage or injury around the mouth
- Bi-lateral injuries such as two bruised eyes
- Bruising to soft area of the face such as the cheeks
- Fingertip bruising to the front or back of torso
- Bite marks
- Burns or scalds (unusual patterns and spread of injuries)
- Deep contact burns such as cigarette burns
- Injuries suggesting beatings (strap marks, welts)
- Covering arms and legs even when hot
- Aggressive behaviour or severe temper outbursts.
- Injuries need to be accounted for. Inadequate, inconsistent, or excessively plausible explanations or a delay in seeking treatment should signal concern.

#### **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 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 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.

Signs that MAY INDICATE emotional abuse

- Over reaction to mistakes
- Lack of self-confidence/esteem
- Sudden speech disorders
- Self-harming
- Eating Disorders
- Extremes of passivity and/or aggression
- Compulsive stealing
- Drug, alcohol, solvent abuse
- Fear of parents being contacted
- Unwillingness or inability to play
- Excessive need for approval, attention, and affection

# **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 occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing, and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Signs that MAY INDICATE neglect.

- Constant hunger
- Poor personal hygiene
- Constant tiredness
- Inadequate clothing
- Frequent lateness or non-attendance
- Untreated medical problems
- Poor relationship with peers
- Compulsive stealing and scavenging
- Rocking, hair twisting and thumb sucking
- Running away
- Loss of weight or being constantly underweight

### Appendix 4 – Support Organisations

NSPCC 'Report Abuse in Education' Helpline

• 0800 136 663 or help@nspcc.org.uk

**National Organisations** 

• NSPCC: www.nspcc.org.uk

• Barnardo's: www.barnardos.org.uk

• Action for Children: www.actionforchildren.org.uk

• Children's Society: www.childrenssociety.org.uk

• Centre of Expertise on Child Sexual Abuse: www.csacentre.org.uk

#### **Support for Staff**

- Education Support Partnership: www.educationsupportpartnership.org.uk
- Professional Online Safety Helpline: www.saferinternet.org.uk/helpline
- Harmful Sexual Behaviour Support Service: https://swgfl.org.uk/harmful-sexual-behaviour-supportservice

Support for pupils/students

• ChildLine: www.childline.org.uk

• Papyrus: www.papyrus-uk.org

• The Mix: www.themix.org.uk

- Shout: www.giveusashout.org
- Fearless: www.fearless.org
- Victim Support: www.victimsupport.org.uk

#### **Support for Adults**

- Family Lives: www.familylives.org.uk
- Crime Stoppers: www.crimestoppers-uk.org
- Victim Support: www.victimsupport.org.uk
- The Samaritans: www.samaritans.org
- NAPAC (National Association for People Abused in Childhood): www.napac.org.uk
- MOSAC: www.mosac.org.uk
- Action Fraud: www.actionfraud.police.uk
- Shout: www.giveusashout.org
- Advice now: www.advicenow.org.uk

#### **Support for Learning Disabilities**

- Respond: www.respond.org.uk
- Mencap: www.mencap.org.uk
- Council for Disabled Children: https://councilfordisabledchildren.org.uk

#### **Contextual Safeguarding Network**

https://contextualsafeguarding.org.uk/

#### Kent Resilience Hub

https://kentresiliencehub.org.uk/

#### **Substance Misuse**

- We are with you (formerly Addaction): www.wearewithyou.org.uk/services/kent-for-young-people/
- Talk to Frank: www.talktofrank.com

#### **Domestic Abuse**

- Domestic abuse services: www.domesticabuseservices.org.uk
- Refuge: www.refuge.org.uk
- Women's Aid: www.womensaid.org.uk
- Men's Advice Line: www.mensadviceline.org.uk
- Mankind: www.mankindcounselling.org.uk
- National Domestic Abuse Helpline: www.nationaldahelpline.org.uk
- Respect Phoneline: https://respectphoneline.org.uk

#### **Criminal and Sexual Exploitation**

- National Crime Agency: www.nationalcrimeagency.gov.uk/who-we-are
- It's not okay: www.itsnotokay.co.uk
- NWG Network: www.nwgnetwork.org

• County Lines Toolkit for Professionals:

www.childrenssociety.org.uk/information/professionals/resources/county-lines-toolkit

#### **Honour Based Abuse**

- Karma Nirvana: https://karmanirvana.org.uk
- Forced Marriage Unit: www.gov.uk/guidance/forced-marriage
- FGM Factsheet:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/4 96415/6\_1639\_HO\_SP\_FGM\_mandatory\_reporting\_Fact\_sheet\_Web.pdf

• Mandatory reporting of female genital mutilation: procedural information:

www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural information

• The right to choose - government guidance on forced marriage:

www.gov.uk/government/publications/the-right-to-choose-government-guidance-on-forced-marriage

#### Child-on-Child abuse, including bullying, sexual violence and harassment

- Rape Crisis: https://rapecrisis.org.uk
- Brook: www.brook.org.uk
- Disrespect Nobody: www.disrespectnobody.co.uk
- Upskirting know your rights: www.gov.uk/government/news/upskirting-know-your-rights
- Lucy Faithfull Foundation: www.lucyfaithfull.org.uk
- Stop it Now! www.stopitnow.org.uk
- Parents Protect: www.parentsprotect.co.uk
- Anti-Bullying Alliance: www.anti-bullyingalliance.org.uk
- Diana Award: www.antibullyingpro.com/
- Bullying UK: www.bullying.co.uk
- Kidscape: www.kidscape.org.uk

#### Online Safety

- NCA-CEOP: www.ceop.police.uk and www.thinkuknow.co.uk
- Internet Watch Foundation (IWF): www.iwf.org.uk
- Childnet: www.childnet.com
- UK Safer Internet Centre: www.saferinternet.org.uk
- Report Harmful Content: https://reportharmfulcontent.com
- Marie Collins Foundation: www.mariecollinsfoundation.org.uk
- Internet Matters: www.internetmatters.org
- NSPCC: www.nspcc.org.uk/onlinesafety
- Get Safe Online: www.getsafeonline.org
- Parents Protect: www.parentsprotect.co.uk

- CyberChoices: https://nationalcrimeagency.gov.uk/what-we-do/crime-threats/cybercrime/cyberchoices
- National Cyber Security Centre (NCSC): www.ncsc.gov.uk

#### Mental Health

- Mind: www.mind.org.uk
- Moodspark:https://moodspark.org.uk
- Young Minds: www.youngminds.org.uk
- We are with you: www.wearewithyou.org.uk/services/kent-for-young-people/
- Anna Freud: www.annafreud.org/schools-and-colleges/

#### Radicalisation and hate

- Educate against Hate: www.educateagainsthate.com
- Counter Terrorism Internet Referral Unit: www.gov.uk/report-terrorism
- True Vision: www.report-it.org.uk

Children with Family Members in Prison

• National information Centre on Children of Offenders (NICCO): https://www.nicco.org.uk

# Prevent Strategy &

# Risk Assessment

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Appendix 1	Prevent Risk Assessment & Action Plan 2022/2023

#### Introduction

- 1.1 Section 26 (1) of the Counter Terrorism and Security Act 2015 places a duty on certain bodies to have "due regard to the need to prevent people from being drawn into terrorism".
- 1.2 The Government's Prevent Strategy was first published in 2011 and forms part of an overall Counter Terrorism Strategy known as CONTEST. The Contest Strategy has four elements which are detailed below:
- Pursue
- Protect
- Prepare
- Prevent
- 1.3 Prevent is a key part of the Contest Strategy which aims to stop people from becoming terrorists or supporting terrorism. Early intervention is at the heart of Prevent in diverting people away from being drawn into terrorist activity as Prevent happens before any criminal activity takes place. It is about recognising, supporting and protecting individuals who might be susceptible to radicalisation. The Prevent Strategy was explicitly changed in 2011 to deal with all forms of terrorism and target not only violent extremism but also non-violent extremism which can create an atmosphere conducive to terrorism and can popularise the views which terrorists exploit.
- 1.4 The government's 2011 Prevent Strategy objectives are as follows:
- Respond to the ideological challenge of terrorism and the threat we face from those that promote it.
- Prevent people from being drawn into terrorism and ensure that they are given appropriate support.
- Work with sectors and institutions where there are risks of radicalisation that we need to address.
- 1.5 The United Kingdom currently faces a range of terrorist threats. All terrorist groups that pose a threat to the UK seek to radicalise and recruit people to their cause. A system of threat levels has been created which represents the likelihood of an attack in the near future. The current Government threat level from international terrorism in the UK is 'substantial' which means that a terrorist attack is likely.

#### 2. Key Definitions

For the purposes of this strategy the following definitions have been adopted.

**Radicalisation** is defined as the process by which people come to support terrorism and extremism and, in some cases, then participate in terrorist groups.

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

**Non-violent extremism** is extremism, as defined above, which is not accompanied by violence.

**Having due regard** means that the authorities should place an appropriate amount of weight on the need to prevent people being drawn into terrorism when they consider all the other factors relevant to how they carry out their usual functions.

**Interventions** these are projects intended to divert people who are being drawn into terrorist activity. Interventions can include mentoring, counselling, theological support, encouraging civic engagement, developing support networks (family and peer structures) or providing mainstream services (education, employment, health, finance or housing).

**Terrorism** is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

#### 3. Key Documents and Contacts

3.1 This strategy should be read in conjunction with the following KITE documentation:-

Child & Adult Protection & Safeguarding Policy 2024
Online Safety Policy
Lockdown Policy & Procedure

All KITE Safeguarding policies

HM Government Contest – The United
Kingdom's Strategy for Countering Terrorism (June 2018)
The Counter Terrorism and Security Act 2015
Prevent Duty guidance: for Further Education institutions in
England and Wales
Keeping Children Safe in Education (September 2022)
Working Together to Safeguard Children (July 2018)
HM Government Contest – The United
Kingdom's Strategy for Countering Terrorism (June 2018)
Searching, Screening & Confiscation

#### 4. Aims and Objectives of the Strategy

#### 4.1 Aims of the Strategy

The aim of KITE College Prevent Strategy is to ensure that the College is able to identify, monitor, manage and deal effectively with the threat posed by any individual or group of individuals engaging in radicalisation and extremism (violent and non-violent) in the name of ideology or belief.

#### 4.2 Objectives of the Strategy

- To develop staff and learner awareness of the statutory Prevent duty and the risks associated with radicalisation.
- To safeguard learners by ensuring that they are able to recognise and protect themselves from radicalisation.
- To document and recognise current practice across the college which effectively manages the risk of learners being exposed to extremism and becoming radicalised.
- To ensure that learners, staff and stakeholders are aware of their roles and responsibilities in preventing violent extremism and radicalisation.
- To promote and reinforce shared values, to create space for free and open debate, and support the learner voice.

#### 5. Curriculum

KITE College is committed to providing a curriculum which promotes knowledge, skills and understanding in order to build the resilience of all learners, by undermining extremist ideology and supporting the learner voice. This will be achieved through;

- Embedding equality, diversity and inclusion across the curriculum and promoting community cohesion.
- Promoting wider skill development such as social and emotional wellbeing.
- Developing a curriculum which recognises local needs, challenges extremism and promotes British Values.
- Learner Council
- Teaching and learning strategies which explore controversial issues in a way which promotes equality, diversity and inclusion.
- The use of external organisations to raise awareness of the existence of extremist activities and develops learners understanding of how to keep themselves safe form Radicalisation.

#### 5.1 Supporting Learners

To ensure that the College community remains safe the following support will be in place for learners;

- An effective referral process to enable staff, learners or members of the local community to report concerns and support for at risk learners through safeguarding and pastoral processes.
- Effective support services which provide clear information, advice and guidance on preventing learners from being drawn into extremism and radicalisation.
- Literature written in clear and simple language which promotes equality, diversity and inclusion and undermines extremist ideology.
- Mechanisms to ensure that the learner voice is heard and the concerns of the learner population are acted upon.
- Clear channels of communication to listen to the voice of the local community and understand local tensions.

#### 6 Responsibilities

The DSL has overall responsibility for ensuring that the Prevent Strategy is implemented across the College and any concerns are shared with the relevant organisations in order to minimise the risk of learners becoming involved with extremist activity.

To ensure that the College effectively manages risks and is able to deal appropriately with issues around radicalisation and extremism the College will:

- Understand the nature of the threat from extremism and how this may impact directly or indirectly on the College.
- Understand and manage potential risks within the College and from external influences including the display of extremist materials and the hiring of College premises.
- Respond rapidly and appropriately to events in local, national or international news that may impact on the College community.
- Ensure measures are in place to minimise the potential for acts of extremism within the College.
- Ensure plans are in place to respond appropriately to a threat or incident within the College.
- Adopt effective ICT security and responsible user policies and promote these to all staff and learners.
- Work collaboratively with key partners including Police to support any learners who are at risk of becoming radicalised or entering extremist activity

All staff have a responsibility to:

- To provide an ethos which upholds the College's vision and values and promotes British Values.
- Report any concerns around extremism or radicalisation via the safeguarding reporting database My Concern.
- Report and remove any literature displayed around the College that could cause offense or promote extremist views.
- Participate in annual safeguarding refresher training.
- Participate in engagement with local communities, and external organisations as appropriate.
- Understand the lockdown procedure and cooperate with any arrangements made or instructions given in the event of an emergency.

#### 7 The Referral Process

Where there is an identified/potential risk that a learner may be involved in supporting or following extremism, further investigation by the police may be requested, along with assessments and interventions. The DSL is responsible for liaising with external agencies for support and guidance.

Any member of staff who identifies such concerns will report these to a Designated Safeguarding Lead via the My Concern referral system where all information will be documented.

Incidents in relation to extremism are expected to be very rare but emergency procedures will be adopted when there is information that a violent act is imminent, or where weapons or other materials may be in the possession of a learner or a community member. In this situation, a 999 call will be made and the College's Principal informed as soon as practicably possible. The College's lockdown will be used as appropriate.

Where a child or vulnerable adult is thought to be in need or at risk of significant harm or where investigations need to be carried out a referral to the Social Services will be made in line with the college Safeguarding procedures.

#### 8 Training

#### 8.1 Staff Training

- 8.1.1 Training on Prevent will be delivered as part of the safeguarding refresher training programme which all staff are required to complete. The college uses National College online training and Face to Face onsite training.
- 8.1.2 Staff will receive training on the college lockdown procedures to ensure that they aware of the process should an act of violence by an individual be perceived to be imminent.
- 8.1.3 The Department for Education's Keeping Children Safe in Education (September 2024) document is available to all staff and will be circulated via e-mail when any changes are made. Staff will be expected to confirm that they have read and understood this document.

#### 8.2 Learner Education

- 8.2.1 All learners studying at KITE will receive Prevent training as part of the college PD programme and this topic will be revisited throughout the academic year.
- 8.2.2 Work around promoting positive behaviours and attitudes including British Values will be embedded within tutorials and across all pathways.
- 8.2.3 A range of activities will be organised for learners to raise awareness and ensure learners are aware of how to keep themselves safe from Radicalisation.

#### 8.3 Trustees

.

- 8.3.1 All governors will complete the online Prevent training.
- 8.3.2 PREVENT referrals and safeguarding concerns data are presented to trustees termly.
- 8.3.3 The designated safeguarding trustee will visit college regularly and include Prevent monitoring as part of safeguarding agenda.

#### 9 Digital Infrastructure

In order to safeguard learners and prevent individuals from accessing extremist materials while using the college network, the college will ensure:

- The firewall package and monitoring and filtering system is used to log and highlight concerns with communication (web browsing, email exchanges searches etc.) by all users on the college network.
- Appropriate staff are able to monitor computing facilities that are made available to staff, learners and visitors.
- Only college approved software will be supported by the college and allowed to be used.
- All unauthorised software that breaches college policy or presents a risk to staff or learner safety will be removed and appropriate action taken.
- All unusual or suspicious events, and any breaches of security are reported to via the safeguarding reporting channels for further investigation.

#### 10 Partnership Working

The College maintains well-established partnerships; including Kent and Medway Prevent Team and Education officers, Kent Police Cyber Prevent & Protect team, Local PCSOs and other agencies. KITE receives regular updates to keep staff and learners safe and well informed.



# Prevent Risk Assessment & Action Plan 2024-2025

PREVENT VULNERABILITY /POSSIBLE RISK	SUMMARY OF ACTIONS TAKEN TO DATE/ALREADY IN PLACE TO MITIGATE RISK	NEW ACTION(S)/FURTHER DEVELOPMENTS	LEAD	Deadline	CURRENT RAG RATING	PROGRESS
	Lessons delivered through PD team Quizzes/Kahoots completed by new learners as part of induction. (PD)	Curriculum to be finalised and all learners are reached.	SMu	31/09/2024		
Is the Prevent agenda and British Values embedded into the college curriculum?	offer & tutorial programme. These will be reviewed annually by the PD team and updated to reflect key developments in practice and intelligence.	To write and deliver a Prevent tutorial for all Adult learning learners  To design and deliver a series of workshops and activities for Internet safety day	SMu Tutors			

Is there sufficient pastoral care and support for all learners, according to the needs of the College?	There is a safeguarding team in place at the college to support staff and learners with a range of safeguarding issues including Prevent related matters. Pastoral staff are readily available for learners to support with prevent related matters.	SG Team		
	The college employs a team of Progress Tutors to support learners at the college. All staff are 'prevent' trained in accordance to the DFE prevent updates.	ALL		
	Online safety and topics around keeping yourself safe are delivered as part of the PD /tutorial programme.	PD		
	The "My Concern" database is used to log and monitor all referrals.	SG Team		

Is the College	Firewall filtering & monitoring of		SM	10/09/2024		
aware of any	content is in place to highlight					
learners that	any concerns with staff and					
may be at risk	learner online activity.					
of	·		SM	10/00/2024		
radicalisation	Transition files are requested		SIM	10/09/2024		
or radicalising	and received from schools					
others?	during the autumn term. These					
	highlight any learners of					
	concern and share key					
Are learners	information.	Delivery through PD				
aware of the		lessons/guest speakers and		L		
Prevent Duty?		1 to 1 as required		Term 1 2024-		
Prevent Duty:				2025		
Are learners						
aware of how to						
keep themselves						
safe from						
radicalisation?						
lauicalisations						
Are learners						
aware of how to						
keep themselves						
safe online?						
sale offilie:						
Are there						
management						
procedures in						
place in respect of						
activities and						
space in the						
College's Multi-						
Faith room						
facilities?						
iacilics!						
					ĺ	

Referral Process &	All staff are aware of the "My	To ensure that all new	SM	Ongoing		New staff
Monitoring	Concern" safeguarding referral	members of staff are				induction
	process and use this to report	trained to use My				safeguarding
	any concerns to the	Concern as part of new				training has
	safeguarding team.	staff induction				taken place in
		programme				the autumn
						term Sept 24
Is there an	My concern is monitored daily		DSL/	Ongoing		·
effective referral	by the safeguarding team and	To update the college	DDSL			
process in place to	appropriate action taken	Safeguarding Policy and				
support learners	following referrals.	ensure that the section				
who are at risk of	My Concern triaging system in	on Prevent is current				
radicalisation and	place ensuring that all referrals	and in line with KCSIE				
are staff and learners aware of	are accessed and allocated to	2024 and the Prevent				
these processes?	appropriate staff efficiently and	statutory duty				
these processes:	in a timely manner. Facilitated					
Is the statutory	by DDSLs					
prevent duty						
reflected in the	The Callege Cafe avanding Deliev		SM	Ongoing		The 2023/2024
appropriate	The College Safeguarding Policy reflects the statutory Prevent		311			Safeguarding
policies and	Duty and this is updated	Prevent to be a standard				Policy has been
procedures?	annually.	agenda item on every				updated and will
	,	weekly Safeguarding				go to trustees for
	The Prevent Duty is also	meeting and concerns	DSL			approval in Nov
	reflected in the following	around prevent are	Team			
	policies;	discussed with DSL's at				
	<ul><li>Online Safety Policy</li><li>Acceptable Use Policy</li></ul>	these meetings.				
	- Acceptable use Fully					

Training  Safeguarding Team Have the Safeguarding	Prevent training has been delivered to all members of the Safeguarding team.  Prevent updates are included in regular safeguarding briefings	Appropriate staff to attend the termly DFE prevent meetings and disseminate information key members of staff	09/2023		
team received appropriate Prevent training?	All new staff receive PREVENT training as part of the Induction programme through National College		09/2023 and repeated 2024		
Tutors  Have all Tutors  received  appropriate  Prevent  training?	Is a refresher process in place for existing staff.	Prevent training to be delivered as part of the New Staff Induction	09/2024		

Staff  Have all members of staff received appropriate Prevent training?	Prevent updates are included in regular safeguarding briefing	National College online Safety prevent module to be completed by all staff	Ongoing		
Governors					
Are all members of the trustee board aware of their Prevent statutory duty?	All trustees complete the online prevent training.	To meet half termly with the safeguarding trustee to discuss any prevent concerns and progress made against the action plan  100% of trustees to complete the online training package	01/12/20 24 Update		

<b>Prevent Risks at</b>	KENT Prevent Coordinator delivered		DSL	Renew 2025		
	prevent session to staff as part of the college training strategy Sept 23					
Access & Use of College Premises	There is in place to ensure that only learners and visitors are able to access the building via an intercom.	Lockdown testing to be completed and ensure process included within new staff and learner areas.	DSL	10/2024		Lockdown policy has been updated and testing has taken place
Are there processes in place to ensure that learners a safe on the college premises?	Access control doors are in place around the college to ensure learners and staff are safe and can only access areas where they have authority to do so.					
Are there effective arrangements	An electronic Visitors system is in place to log all visitors and contractors.			Sept 2024		
in place to manage access to the site by visitors and	A coloured lanyard system is in place to denote different levels of access and supervision for visitors and volunteers.			Oct 2024		
non- learners/staff?						

Does the	A lockdown process has been			In place –		
College have a	agreed and is in place			regular		
critical	agreed and is in place			drills		
incident	A lockdown briefing has been			arms		
management	delivered to all staff.					
plan which is	delivered to all stair.					
capable of	Staff have had the enpertunity to					
dealing with	Staff have had the opportunity to					
terrorist-	practice using the door locking					
related issues	mechanisms.					
related issues						
	Audit of all rooms at KITE College					
	complete and all rooms now have					
	an internal locking mechanism to					
	be used in the event of lockdown					
Access &						
Monitoring of	A firewall is in place to protect					
	electronic communications.	Cyber Security guidance		Oct 2024		
IT & Systems	Cicci onic communications.	to be reviewed	Akita	000 2024		
D 41						
Does the	Content filtering& Monitoring is in			Oct 2024		
College employ	place to monitor electronic			000 202 1		
filtering/firewal	communications and highlight key					
I systems to	words and searches.					
prevent						
staff/learners/						
visitors from						
accessing						
extremist						
websites and						
material?						

Does the College have policies relating to the use of IT? If so, do they contain a specific reference to the Prevent Duty/misuse of IT equipment	An Online Safety Policy is in place and regularly reviewed as part of the policy review cycle.  An Acceptable Use of IT Policy in place with reference to misuse of IT is referenced.	DSL	Updated March 2024 Updated /signed Sept 2024		

Partnership Working					
Is the College engaging effectively the following external organisations?	Regular contact is maintained with the Prevent Coordinator who provides appropriate training and briefings for staff.	SL-SM nd BiMo	04/25		
Is the college working effectively to raise concerns with local prevent organisations?	Members of the safeguarding team attend trainings and briefings to ensure that they are up to date with local, regional and national developments.				
	A parental engagement programme in place to support parents in safeguarding their children. Online safety, Prevent and radicalisation included.				