

Policy Title **Safeguarding**

Author/Responsible Manager	Designated Safeguarding Lead
Original Issue Date	June 2007
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Risk Assessment (please note here any identified risks of non-compliance with the policy)	<ul style="list-style-type: none"> Children/young people and vulnerable adults are subjected to manageable safeguarding risks, potentially resulting in harm. Breach of safeguarding/child protection legislation. Staff are subjected to false allegations. Staff and volunteers are recruited inappropriately. Staff are unclear about their professional responsibilities.

Equality Impact Assessment				
Characteristic	No impact	Positive impact	Negative impact	Evidence
Race	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Disability	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Gender	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Pregnancy/Maternity	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Religion/belief	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Sexual orientation	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Age	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Gender reassignment	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Marriage & civil partnership	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Carried out by: Vickie Williamson				

Actions required:

Action	Date	Reviewed by	Date

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.

Date written: August 2024 (with KCSIE 2024 guidance)

Date of next review: August 2025

This policy will be reviewed at least annually and/or following any updates to national and local guidance and procedure.

Key Contacts

	Name
Designated Safeguarding Lead (DSL)	Vickie Williamson Hilary Pezet
Deputy Designated Safeguarding Leads Safeguarding Manager	Richard Evans Sam Pollitt
Children Looked After Designated Teacher	Sam Pollitt
Prevent Leads	Vickie Williamson Hilary Pezet
Senior Mental Health Lead	Vickie Williamson
Principal	Kelvin Nash
Safeguarding Link Governor	Carla Clarke

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1. Child Focused Approach to Safeguarding

1.1 Introduction

- Kendal College recognises our statutory responsibility to safeguard and promote the welfare of all children. Safeguarding and promoting the welfare of children is everybody's responsibility and everyone has a role to play. All members of our community (staff, volunteers, governors, leaders, parents/carers, wider family networks, and learners) have an important role in safeguarding children and all have an essential role to play in making our community safe and secure.
- Kendal College believes that the best interests of children always come first. All children (defined in law and in this policy as those up to the age of 18) have a right to be heard and to have their wishes and feelings taken into account and all children regardless of age, sex (gender), ability, culture, race, language, religion or sexual identity or orientation, have equal rights to protection.
- Staff working with children at Kendal College will maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff will always act in the best interests of the child and if any member of our community has a safeguarding concern about any child or adult, they should act immediately.
- This policy applies where there are any child protection concerns regarding children who attend Kendal College but may also apply to other children connected to Kendal College, for example, siblings, or younger members of staff (under 18s) or children on learner/work placements.
- Kendal College recognises the importance of providing an ethos and environment within Kendal College that will help children to be safe and to feel safe. In our College children are respected and are encouraged to talk openly. We will ensure children's wishes and feelings are taken into account when determining what safeguarding action to take and what services to provide.
- Kendal College recognises the importance of adopting a trauma-informed approach to safeguarding; we understand there is a need to consider the root cause of children's behaviour and consider any underlying trauma.
- Our core safeguarding principles are:
 - Prevention: positive, supportive, safe culture, curriculum and pastoral opportunities for children, 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: adopt a child-centred approach and provide support for all learners, parents/carers and staff, and where appropriate, implement specific interventions for those who may be at risk of harm.
 - Collaboration: with both parents/carers where possible, 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 governors, temporary or third-party agency staff and volunteers, and are consistent with those outlined within 'Keeping Children Safe in Education' 2024.

1.2 Policy Context

- This policy is implemented in accordance with our compliance with the statutory guidance from the Department for Education, 'Keeping Children Safe in Education' 2024 which requires individual schools and colleges to have an effective safeguarding and child protection policy.
- This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004 and related guidance. This includes but is not limited to:
 - o Keeping Children Safe in Education 2024 (KCSIE)
 - o Working Together to Safeguard Children 2023 (WTSC)
 - o Ofsted: Education Inspection Framework
 - o Framework for the Assessment of Children in Need and their Families 2000
 - o Cumbria Safeguarding Children's Partnership (CSCP) and locally agreed procedures.
www.cumbriasafeguardingchildren.co.uk
 - o The Education Act 2002
 - o Education and Inspections Act 2006
 - o The Human Rights Act 1998
 - o The Equality Act 2010 (including the Public Sector Equality Duty)
- Section 175 of the Education Act 2002 requires school governing bodies, local education authorities and further education institutions to make arrangements to safeguard and promote the welfare of all children who are pupils at a school, or who are students under 18 years of age. Such arrangements will have to have regard to any guidance issued by the Secretary of State.
- Kendal College will follow local or national guidance in response to any emergencies. We will amend this policy and our procedures as necessary but regardless of the action required, our safeguarding principles will always remain the same and the welfare of the child is paramount.
- Kendal College recognises 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.

1.3 Definition of Safeguarding

- In line with 'Working Together to Safeguard Children and KCSIE 2024, safeguarding and promoting the welfare of children is defined for the purposes of this policy as:
 - o providing help and support to meet the needs of children as soon as problems emerge.
 - o protecting children from maltreatment, whether that is within or outside the home, including online.
 - o preventing impairment of children's mental and physical health or development.
 - o ensuring that children grow up in circumstances consistent with the provision of safe and effective care.
 - o promoting the upbringing of children with their birth parents, or otherwise their family network, whenever possible and where this is in the best interests of the child(ren).

- o taking action to enable all children to have the best outcomes.
- Child protection is part of safeguarding and promoting the welfare of all children and is defined as activity that is undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

1.4 Definition of Vulnerable Adult:

- Under section 115 (4)(a) Police Act 1997, a person may be considered to be vulnerable if they receive:
 - o Accommodation and nursing or personal care in a care home, or
 - o Personal care in their own home through a domiciliary care agency or
 - o Health care services provided by an independent hospital, independent clinic, independent medical agency or National Health Service body, or
 - o Services provided in an establishment catering for a person with learning difficulties
 - o And, in consequence of any one, or any combination, of the following factors, namely:
 - o A substantial learning or physical disability, or
 - o A physical or mental illness, chronic or otherwise, including an addiction to alcohol or drugs, or
 - o A substantial reduction in physical or mental capacity due to advanced age.
 - o They are substantially dependent upon others in performing basic physical functions, or their ability to communicate with those providing services, or to communicate with others, is severely impaired, and, as a result they would be incapable to protect themselves from assault or other physical abuse, or there is a potential danger that their will or their moral well-being may be subverted or overpowered.
- Kendal College acknowledges that safeguarding includes a wide range of specific issues including (but not limited to):

Abuse, neglect and exploitation	Hate
Bullying, including cyberbullying	Homelessness
Children with family members in prison	Human trafficking and modern slavery
Children Missing Education (CME)	Mental health
Child missing from home or care	Nude or semi-nude image sharing, aka youth-produced/involved sexual imagery or "Sexting"
Child on child abuse	Online safety
Child Sexual Exploitation (CSE)	Preventing radicalisation and extremism
Child Criminal Exploitation (CCE)	Private fostering
Contextual safeguarding (risks outside the family home)	Relationship abuse
County lines and gangs	Serious Violence

Domestic abuse	Sexual Violence and Sexual Harassment
Drugs and alcohol misuse	Sexting
Fabricated or induced illness	So-called honour-based abuse including Female Genital Mutilation (FGM) and forced marriage
Faith abuse	Upskirting
Gender-based abuse and violence against women and girls	

(Also see Part one and Annex B within 'Keeping Children Safe in Education' 2024)

1.4 Related Safeguarding Policies

Kendal College Policies	
Complaints	Emergency Procedures such as evacuations and lockdowns
Confidentiality	Risk assessments, such as college trips
Staff Code of Conduct	Disciplinary Policy
Whistleblowing	Acceptable Use Templates/Policy
Data protection and Information Sharing Policy	Attendance Policy
Safer Recruitment Policy	Work Placement Policy

Supporting Guidance (to be read and followed alongside this document)

- o [“Guidance for Safer Working Practice for Adults who Work with Children and Young People in Education Settings” - Safer Recruitment Consortium](#)
- o “What to do if you are worried a child is being abused” – [DfE, March 2015](#)

These documents can be found on the links above.

1.5 Policy Compliance, Monitoring and Review

- Kendal 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 learned. 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 and/or Annex A of KCSIE 2024 as appropriate. This can be found on the CPD page of MyKC. Paper copies are available from the Safeguarding Manager.
- Parents/carers can obtain a copy of the Kendal College Safeguarding Policy and other related policies on request. Additionally, our policies can be viewed via the Kendal College [website](#).
- The policy forms part of our Kendal College Strategic Plan and will be reviewed annually by the Corporation who has responsibility for oversight of safeguarding and child protection systems.
- The Designated Safeguarding Lead and Principal will ensure regular reporting on safeguarding activity and systems to the Corporation. The Corporation will not receive details of individual learner situations or identifying features of families as part of their oversight responsibility.

2. Key Responsibilities

2.1 Governance and Leadership

- The Corporation and senior leadership team have a strategic responsibility for our safeguarding arrangements and will comply with their duties under legislation. The Corporation has regard to the KCSIE guidance and will ensure our policies, procedures and training is effective and complies with the law at all times.
- All Corporation members will read and work in accordance of the KCSIE 2024 and will attend the regular safeguarding training they are offered which will equip them with the knowledge to provide strategic challenges to test and assure themselves that the safeguarding policies and procedures are effective, and support the delivery of a robust whole college approach to safeguarding.
- The College has a nominated governor responsible for safeguarding. The nominated governor will support the DSL and have oversight in ensuring that the college has an effective policy that 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 college safeguarding governor will make regular visits to review procedures that are in place and provide updates to the Corporation, where appropriate.
- The Corporation and college senior leadership team will ensure that the Designated Safeguarding Lead (DSL) is supported in their role.
- The Corporation 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 Corporation are aware of its 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 Cumbria Safeguarding Children Partnership [CSCP](#).
- This includes but is not limited to safeguarding all members of the college community (for example, staff, learners, parents/carers and other family members) identified with protected characteristics within the Equality Act; age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation.
 - For further information about our approaches to equality, diversity, and inclusion, please access our college's [website](#).
- The Corporation and senior 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 children's welfare.
- The Principal will ensure that our safeguarding policies and procedures adopted by the Corporation are understood, and followed by all staff.
- The Corporation will ensure an appropriate senior member of staff, from the college senior leadership team, is appointed to the role of designated safeguarding lead. The Corporation and senior 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 governor for safeguarding. The nominated governor will support the DSL and have oversight in ensuring that the College has an effective policy that 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.

2.2 Designated Safeguarding Lead (DSL)

- Kendal College has appointed Vickie Williamson and Hilary Pezet, Directors of Student Engagement, Support and Services, and members of the senior leadership team, as the Designated Safeguarding Leads (DSL).
- The DSL has overall responsibility for the day-to-day oversight of safeguarding and child protection systems (including online safety and understanding the filtering and monitoring systems and processes in place) in college. Whilst the activities of the DSL may be delegated to the deputies, the ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility will not be delegated.
- The College has also appointed Deputy DSLs who will have delegated responsibilities and act in the DSLs absence.
 - Richard Evans, Deputy Principal, and Sam Pollitt, Safeguarding Manager.

- The DSL (and any deputies) will be more likely to have a complete safeguarding picture and will be the most appropriate person to advise staff on the response to any safeguarding concerns.
- It is the role of the DSL to carry out their functions as identified in Annex C of KCSIE. 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.
 - Coordinating safeguarding action for individual children.
 - When supporting children with a social worker or children looked after, 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 and WTSC.
 - Ensuring that locally established procedures as put in place by the safeguarding partners as part of the Cumbria Safeguarding Children Partnership (CSCP) procedures, including referrals, are followed, as necessary.
 - Representing, or ensuring 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 Academy to discuss any safeguarding concerns.
 - Ensuring adequate and appropriate DSL cover arrangements in response to any closures and any out-of-hours and/or out-of-term activities.
 - Taking lead responsibility for online safety, including understanding the filtering and monitoring systems and processes in place.
 - Helping promote educational outcomes by sharing 'need to know' 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 senior leadership staff, as appropriate.
 - Ensuring all staff access appropriate safeguarding training and relevant updates in line with the recommendations within KCSIE.
 - Liaising with the Principal to inform them 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' level 3 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.

2.3 Members of staff

- Our staff plays a particularly important role in safeguarding as they are in a position to observe any changes in a child's behaviour or appearance, identify concerns early, provide help for children, promote children's welfare and prevent concerns from escalating.

All members of staff have a responsibility to:

- provide a safe environment in which children can learn.
 - be aware of the indicators of abuse, neglect and exploitation so that they can identify cases of children who may need help or protection.
 - know what to do if a child tells them that they are being abused, neglected, or exploited and understand the impact abuse, neglect and exploitation can have upon a child.
 - be able to identify and act upon indicators that children are, or at risk of developing mental health issues.
 - understand their role in professional curiosity.
 - be prepared to identify children who may benefit from early help.
 - understand the early help process and their role in it.
 - understand the College safeguarding policies and systems.
 - undertake regular and appropriate training which is regularly updated.
 - be aware of the local process of making referrals to children's social care and statutory assessment under the Children Act 1989.
 - know how to and maintain an appropriate level of confidentiality.
 - reassure children who report concerns that they are being taken seriously and that they will be supported and kept safe.
 - understand that teachers (including headteachers) should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.
- Staff at Kendal College recognise that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as being abusive or harmful. This should not prevent staff from having professional curiosity and speaking to a DSL if they have any concerns about a child.
 - Staff at Kendal College will determine how best to build trusted relationships with children, young people and parents/carers which facilitate appropriate professional communication in line with existing and relevant policies, for example, our staff Code of Conduct and the learner disciplinary policy.

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 Kendal 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.

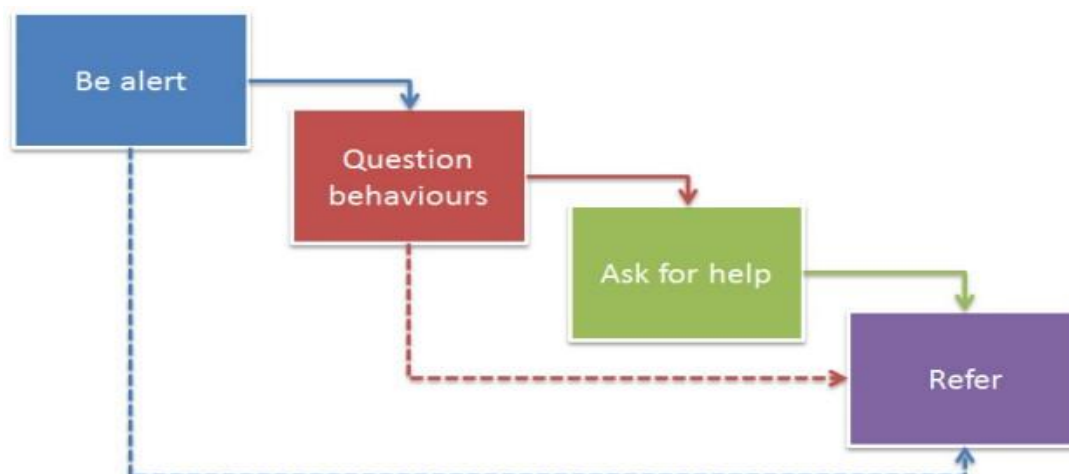
- o Seek help and support from the College or other agencies.

3. Child Protection Procedures

3.1 Recognising indicators of abuse, neglect and exploitation

- Staff will maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff will always act in the best interests of the child.
- All staff are made aware of the definitions and indicators of abuse, neglect and exploitation as identified by 'Working Together to Safeguard Children'-2023 and 'Keeping Children Safe in Education-2024'.
- Kendal College recognises that when assessing whether a child may be suffering actual or potential harm there are four categories of abuse (for more in-depth information, see appendix 1):
 - o Physical abuse
 - o Sexual abuse
 - o Emotional abuse
 - o Neglect
- By understanding the indicators of abuse, neglect and exploitation, we can respond to problems as early as possible and provide the right support and services for the child and their family.
- All members of staff are expected to be aware of and follow the below approach if they are concerned about a child:

All members of staff are expected to be aware of and follow this approach if they are concerned about a child:



[‘What to do if you are worried a child is being abused’ 2015](#)

- Kendal 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, neglect and exploitation can vary from child to child. 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, neglect and exploitation do not automatically mean a child is being abused, however all concerns should be taken seriously and will be explored by the DSL on a case-by-case basis.
- Kendal 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.

- Parent/carer behaviours can indicate child abuse or neglect, so staff will be alert to parent/carer-child interactions or concerning parent/carer behaviours; this could include parents/carers who are under the influence of drugs or alcohol, or if there is a sudden change in their mental health.
- Children may report abuse happening to themselves, their peers, or their family members. All reports made by children 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. Children can be at risk of abuse or exploitation in situations outside their families; extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, sexual abuse, extremism, serious youth violence and county lines.
- Kendal College recognises that technology can be a significant component in many safeguarding and wellbeing issues as children are at risk of abuse online from people they know (including other children) and from people they do not know. In many cases, abuse will take place concurrently via online channels and in daily life.
- Kendal College recognises that some children have additional or complex needs and may require access to intensive or specialist services to support them.
- Following a concern about a child's safety or welfare, the searching and screening of children and confiscation of any items, including any electronic devices, will be managed in line with the College disciplinary policy.
 - The DSL (or deputy) will be informed in advance of any necessary searching incidents where there are reasonable grounds to suspect a learner is in possession of a prohibited item. 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 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 the child, reflecting back the concern.
 - use the child's language.
 - be non-judgmental.
 - avoid leading questions; only prompting the child where necessary with open questions to clarify information where necessary. For example, who, what, where, when or Tell, Explain, Describe (TED).

- o do not promise confidentiality as concerns will have to be shared further, for example, with the DSL and potentially Integrated Children's Services.
 - o to be clear about boundaries and how the report will be progressed.
 - o record the concern using the facts as the child presents them, in line with the College record keeping requirements.
 - o inform the DSL (or deputy), as soon as practically possible.
- If staff have any concerns about a child'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 Children's Services Early Help Team, or consult with a social worker at the multi-agency safeguarding hub. In these circumstances, any action taken will be shared with a DSL as soon as 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.
- Kendal College will respond to safeguarding concerns in line with the Cumbria Safeguarding Children Partnership Threshold Document, which is found online [here](#).
- KCSIE (2024) states that professionals should be alert to the need for early for a child who:
 - o is frequently missing/goes missing from education, home or care.
 - o has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in alternative provision or a pupil referral unit.
 - o has a parent or carer in custody or is affected by parental offending.
- Where it is identified a child may benefit from Early Help support, the DSL (or deputy) will lead if appropriate and make a request for support via the multi-agency safeguarding hub or the College's designated Early Help Officer.
 - o The DSL or Safeguarding Manager will keep all Early Help cases under constant review and consideration will be given to escalating concerns to the multi-agency safeguarding hub 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 Early Help 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. See section 11 for Children's Services contact details.
- 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 'single contact form' will be made immediately to the Cumberland or Westmorland and Furness safeguarding hub and/or the police in line with CSCP Safeguarding Procedures.
 - o Kendal College recognises 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 CSCP guidance which may involve multi-agency decision making.
 - o They may also seek advice or guidance from a social worker at the Safeguarding Hub who are the first point of contact for children's services.

- In the event of a single point of contact being necessary, parents/carers will be informed and consent to this will be sought by the DSL in line with guidance provided by CSCP. 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 single point of contact 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 CSCP escalation policy to ensure their concerns have been addressed and, most importantly, that the child's situation improves.
- DSLs and staff will be mindful of the need for the College to ensure any activity or support implemented to support children and/or families is recorded. Support provided by the College where families are struggling will be overseen and reviewed by the DSL on a regular basis to ensure activity does not obscure potential safeguarding concerns from the wider professional network.

Child Protection Procedures

- If staff are made aware of a child protection concern, they are expected to:
 - listen carefully to the concern and be non-judgmental.
 - only use open questions to clarify information where necessary, e.g. who, what, where, when or Tell, Explain, Describe (TED).
 - 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 in line with the College record keeping requirements - see section 9.
 - inform the DSL (or deputy), immediately, in person. Email can be used if this is during teaching time.
 - Kendal College adheres to the CSCP Threshold document.
- Kendal College is an [Operation Encompass College](#). This means we work in partnership with the Cumbria Constabulary to provide support to children experiencing domestic abuse.
- The college recognises that in situations where there are immediate safeguarding concerns identified in line with Support Level Guidance, it is NOT to investigate as a single agency but to act in line with CSCP guidance which may involve multi-agency decision making. They may also seek advice or guidance from a social worker at the safeguarding hub who are the first point of contact for Children's Services.
- If a child is in immediate danger or is at risk of harm, a request for support will be made immediately to the safeguarding hub and/or the police in line with CSCP Safeguarding Procedures.
- All staff are aware of the process for making requests for support referrals for statutory assessments under the Children Act 1989, along with the role they might be expected to play in such assessments.

- In most cases, a request for support will be made by the DSL or a deputy. However, if the DSL or a deputy is not immediately available to discuss an urgent concern, staff will seek advice from another member of the college leadership team, from Children's Services Front Door Consultation Line or consult with a social worker from the Safeguarding Hub. See section 11 for contact details.

If anyone other than the DSL makes a referral to external services, they will inform the DSL as soon as possible.

- In the event of a request for support to the safeguarding hub being necessary, parents/carers will be informed and consent to this will be sought by the DSL in line with guidance provided by CSCP. Parents/carers will be informed 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.
- The DSL will keep all early help cases under constant review and consideration will be given to a request for support to the safeguarding hub if the situation does not appear to be improving or is getting worse.
- If, after a request for support or any other planned external intervention, a child's situation does not appear to be improving, the DSL will consider following the CSCP Escalation Policy to ensure their concerns have been addressed and, most importantly, that the child's situation improves.

Early Help

Early help support provided for a child/young person or family who

- have additional needs or
- emerging needs or
- where needs are unclear and these cannot be met from within our own resources alone and they would benefit from a multi-agency response, but not where there is a risk of significant harm.

Any child/young person may benefit from early help in particular any child/young person who:

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan (EHCP))
- has a mental health need
- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from education, home or care,
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges, attends alternative provision or pupil referral unit
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- is at risk of being radicalised or exploited
- has a parent or carer in custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing alcohol and other drugs themselves
- is at risk of so-called 'honour'-based abuse such as female genital mutilation (FGM) or a forced marriage (FM)
- is a privately fostered child
- The [Cumbria multi-agency threshold guidance](#) sets out the local criteria for action, the process for assessment and the level of services to be provided. Further information can be accessed via the Westmorland and Furness [families information](#) website.

3.3 Recording Concerns

- All safeguarding concerns, discussions, decisions, and reasons for those decisions, will be recorded

in writing via the College's CPOMS platform and brought without delay to the attention of the DSL.

- Records will be completed as soon as possible after the incident/event, using the child'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 to a child 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 or Safeguarding Manager.
- 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, why the decision was taken and the outcome.
- Child protection records are 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 child in the college. Child protection records are kept in accordance with data protection legislation and are retained centrally and securely by the DSL/Safeguarding Manager.

- If a child transfers to a different college/setting, all child protection records will be transferred in accordance with data protection legislation to the child's subsequent college/setting, via CPOMS if the receiving college/setting use CPOMS, or 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 college/setting in advance of a child leaving, for example, information that would allow the new college/setting to continue to provide support.
- Where the College receives child protection files from another setting, the DSL or Safeguarding Manager will ensure key staff such as the Special Educational Needs Coordinators (SENCOs) will be made aware of relevant information as required.
- Where a student joins the school 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 student, and if so, if the files have been sent.

3.4 Multi-Agency Working

- Kendal College recognises the pivotal role we have to play in multi-agency safeguarding arrangements and is committed to its responsibility to work within the Local arrangements as identified within 'Working Together to Safeguard Children'.
- The College senior leadership team, Corporation and DSL will work to establish strong and co-operative local relationships with professionals in other agencies, including the safeguarding partners in line with local and national guidance.
- Kendal 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 CSCP 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 multi-agency meetings.
- The College will allow access for Cumberland and/or Westmorland and Furness 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 and 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's disciplinary policy.

3.5 Confidentiality and Information Sharing

- Kendal 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.
- Where reasonably possible, the college will hold more than one emergency contact number for each learner. There is an expectation that contact information will be held for both parents, unless doing so would put a child at risk of harm.
- Kendal 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. Tamara Breeze, Director of Governance, is the Local Data Protection Officer at Kendal College.
- 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, the Information Commissioner's Office (ICO) and the DfE "Information sharing advice for safeguarding practitioners" guidance provides further details regarding information sharing principles and expectations.
- The Principal and 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, 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 outside agencies such as Police and Children's Social Care. All staff are aware they cannot promise a child 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 child.

3.6 Complaints

- All members of the College community should feel able to raise or report any concerns about children's safety or potential failures in the College's safeguarding processes and procedures. The College has a complaints procedure available to parents/carers, learners and members of staff and visitors who wish to report concerns or complaints. This can be found on the Kendal College website.
- 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 in education 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.
 - Staff can call 0800 028 0285 (8:00 AM to 8:00 PM Monday to Friday) or email help@nspcc.org.uk.
- The senior leadership team at Kendal 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.
- 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

- Kendal College is aware of the range of specific safeguarding issues and situations that can put children at greater risk of harm. In addition to Part One of KCSIE, DSLs, Kendal College leaders and staff who work directly with children, will read Annex B of KCSIE which contains important additional information about the following 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 Kendal 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 the College and online.
- Kendal 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.
 - 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.
 - Initiation/hazing type violence and rituals.
- Any allegations of child-on-child abuse will be recorded, investigated, and dealt with in line with this safeguarding policy and KCSIE (in particular, part two and five).

- Kendal 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” as 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.
- Kendal College recognises that even if there are no reported cases of child-on-child abuse, such abuse can still take 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, Kendal College will: ^(O&B)

- Implement a robust disciplinary policy, provide an age and ability appropriate Values/tutorial curriculum, provide a range of reporting mechanisms for example through course tutors and learner voice.
- All allegations of child on child abuse will be recorded, investigated, and dealt with in line with associated college policies, including the safeguarding and disciplinary policies.
- Kendal College wants children 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 the safeguarding and disciplinary policies. 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 learners’ and parents/carers. Offsite behaviour concerns will be recorded and responded to in line with existing appropriate policies, for example the learner code of conduct, disciplinary and safeguarding policies.
- Alleged victims, alleged perpetrators and any other child affected by child-on-child abuse will be supported by:
 - Being listened to and being heard, with reports taken seriously. Victim blaming will be avoided and appropriate wellbeing support will be provided, including access to the college wellbeing practitioner.
 - If required, educational approaches may be reviewed and police and/or the safeguarding hub informed.

4.2 Child-on-Child Sexual Violence and Sexual Harassment

- When responding to concerns relating to child-on-child sexual violence or harassment, Kendal College will follow the guidance outlined in Part five of KCSIE.
- Kendal College recognises that sexual violence and sexual abuse can happen anywhere, and all staff will maintain an attitude of ‘it could happen here.’ Kendal 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 seriously and in line with relevant policies/procedures, for example disciplinary, IT code of conduct, online safety and safeguarding, where appropriate.
- Kendal 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.
- Kendal 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 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 (or deputy) is 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-by-case 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 and relevant local/national guidance and support.
 - 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 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 Early Help and/or Safeguarding Hub) 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 Behavior has been displayed.
 - the ages of the children involved.
 - the developmental stages of the children involved.
 - any power imbalance between the children.

- o 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.
 - o that sexual violence and sexual harassment can take place within intimate personal relationships between children.
 - o understanding intra familial harms and any necessary support for siblings following incidents.
 - o whether there are any ongoing risks to the victim, other children, adult students, or College staff.
 - o 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.

4.3 Nude and/or Semi-Nude Image Sharing by Children

- Kendal 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 (or deputy).
- 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:
 - o to report any concerns to the DSL immediately.
 - o 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.
 - o do not delete the imagery or ask the child to delete it.
 - o to avoid saying or doing anything to blame or shame any children involved.
 - o 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.
 - o 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 semi-nudes: advice for education settings working with children and young people \(updated March 2024\)](#) and the local guidance. When made aware of a concern involving consensual and non-consensual sharing of nudes and semi-nude images and/or videos:

- o 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.
- o 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.
- o All decisions and action taken will be recorded in line with our safeguarding procedures.
- o A referral will be made to the safeguarding hub and/or the police immediately if:
 - The incident involves an adult (over 18).
 - 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.
- o The DSL may choose to involve other agencies at any time if further information/concerns are disclosed at a later date.
- o If DSLs are unsure how to proceed, advice will be sought from the Safeguarding Hub.

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

- Kendal 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.
- Kendal 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).
- Kendal 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 safeguarding concerns by speaking with a DSL or deputy. The initial response to child victims is important and staff will take any allegations seriously and work in ways that support children and keep them safe.

4.6 Modern Slavery

- Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Statutory Guidance: [Modern slavery: how to identify and support victims](#).
- If there are concerns that any member of the community is a victim or involved with modern slavery, concerns should be shared with a DSL or deputy and will be responded to in line with this policy.

4.7 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 (or a deputy). If there is an immediate threat, the police will be contacted.
- All staff will speak to the DSL (or deputy) if they have any concerns about forced marriage. Staff can also contact the Forced Marriage Unit if they need advice or information: 020 7008 0151 or fm@fcdo.gov.uk
- Whilst all staff will speak to the DSL (or deputy) if they have any concerns about FGM, there is a specific legal reporting duty on teachers.
 - Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers in England and Wales, **to personally report to the police where they discover that FGM appears to have been carried out on a girl.**

- o It will be rare for teachers to see visual evidence, and they should not be examining learners, however teachers who do not personally report such concerns may face disciplinary sanctions. Further information on when and how to make a report can be found at: [Mandatory reporting of female genital mutilation procedural information](#) and [FGM Mandatory reporting Duty Fact Sheet](#).
- o Unless the teacher has good reason not to, they are expected to also discuss any FGM concerns with the DSL (or a deputy), and Children's Services should be informed as appropriate.

4.8 Preventing Radicalisation

- Kendal College recognises that children are vulnerable to extremist ideology and radicalisation. Kendal 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.
- All staff have received appropriate training to enable them to be alert to changes in children's behaviour which could indicate that they may need help or protection from radicalisation.
- Staff will report any concerns to the DSL (or a deputy), who is aware of the local procedures to follow for making a Prevent referral. If there is an immediate threat, the police will be contacted via 999.

4.9 Cybercrime

- Kendal College recognises that children with particular skills and interests 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 or a deputy 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 safeguarding policy and other appropriate policies.
- Advice can be sought from the Cumbria Constabulary.

4.10 Domestic Abuse

- Kendal College recognises that:
 - domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents.
 - domestic abuse can include, but is not limited to, psychological (including coercive control), physical, sexual, economic, or emotional abuse.
 - children can be victims of domestic abuse if they see, hear, or experience the effects of abuse at home, witness the ill-treatment of others and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse).
 - anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background, and domestic abuse can take place inside or outside of the home.
 - Domestic abuse can take place within different types of relationships, including ex-partners and family members.
 - there is always a potential for domestic abuse to take place when parents/families separate, or for existing domestic abuse to persist or escalate post separation.
 - Domestic abuse can have a detrimental and long-term impact on children's health, well-being, development, and ability to learn.
 - domestic abuse concerns will not be looked at in isolation and our response will be considered as part of a holistic approach which takes into account children's lived experiences.
 - it is important not to use victim blaming language and to adopt a trauma informed approach when responding to concerns relating to domestic abuse.
- If staff are concerned that a child may be at risk of seeing, hearing, or experiencing the effects of any form of domestic abuse, or in their own intimate relationships, immediate action should be taken by speaking to the DSL or a deputy.
- Kendal College is an [Operation Encompass College](#). This means we work in partnership with the Cumbria Constabulary to provide support to children experiencing the effects of domestic abuse. An Operation Encompass notification is sent to the school/college when the police are called to an incident of domestic abuse and there are children in the household; the police are expected to inform schools/colleges before the child(ren) arrive the following day.
 - Operation Encompass notifications help ensure that we have up to date and relevant information about children's circumstances and enables us to put immediate support in place according to the child's needs.
 - Operation Encompass does not replace statutory safeguarding procedures and where appropriate, a referral to the safeguarding hub will be made if there are any concerns about a child's welfare.
 - Where the school/college is unsure of how to respond to a notification, advice will be sought from the Children's Services or the Operation Encompass helpline which is available 8AM to 1PM, Monday to Friday on 0204 513 9990.

4.11 Mental Health

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

- Staff are aware that children's experiences, for example where children have suffered abuse, neglect and exploitation, or other potentially traumatic Adverse Childhood Experiences (ACEs), can impact on their mental health, behaviour, and education.
- Staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.
- If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by speaking to the DSL or a deputy.

5. Supporting Children Potentially at Greater Risk of Harm

- Whilst all children should be protected, Kendal College acknowledges 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)

- Kendal College acknowledges that children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges and barriers for recognising abuse, neglect and exploitation.
- Kendal College recognises that children with SEND may face additional communication barriers and experience difficulties in managing or reporting abuse or challenges. Children with SEND 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 children with SEND, or certain medical conditions may be disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.
- Members of staff are encouraged to be aware that children with SEND can be disproportionately 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 and wellbeing support and attention for children with SEND. The DSL will work closely with the SENCOs to plan support as required.

5.2 Children requiring mental health support

- Kendal College has an important role to play in supporting the mental health and wellbeing of our learners. Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.
- Beth Lowery, Director of Student Engagement, Support and Services and DSL is the senior mental health lead at Kendal College following certification with Creative Education. This member of staff is also a qualified mental health first aider.
- Where there are concerns regarding possible mental health problems for students, staff should:
 - take immediate action and speak to the DSL, the senior mental health lead or a deputy DSL.
- Age/ability appropriate education will be provided to our students to help promote positive health, wellbeing, and resilience, through our Values and Tutorials curriculum and age appropriate workshops and visits from other organisations, including Kooth and Diversity Role Models.

5.3 Children absent from education

- Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines.
- A robust response to children who have unexplainable and/or persistent absences from education, prolonged periods and/or on repeat occasions will support the identification of such abuse and may help prevent the risk of children going missing in the future. This includes when problems are first emerging and also where children are already known to Children's Services and/or have a social worker (such as a child who is a child in need or who has a child protection plan, or is a child looked after), where being absent from education may increase known safeguarding risks within the family or in the community.
- 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 a welfare and/or safeguarding concern (see section 3.5).
- Where the College has concerns that a child is missing from education, we will respond in line with our statutory duties (DfE: [Children missing education](#)) and local policies.

5.4 Children who need a social worker (child in need and child protection plans)

- 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 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/wellbeing and/or academic support.

5.5 Children looked after, previously looked after children and care leavers

- Kendal College recognises the common reason for children becoming looked after is as a result of abuse and/or neglect and a previously child looked after also potentially remains vulnerable.
- The college has appointed a '[designated teacher](#)' who works with local authorities, including the local authorities virtual schools, to promote the educational achievement of registered learners 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, as appropriate.
- Where a child is looked after, the DSL/Designated Teacher will hold details of the social worker and the name of the virtual school 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 Early Help Team.
- Where a child is leaving care, the DSL/Designated Teacher 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.

5.6 Children who are lesbian, gay, bisexual or gender questioning (LGBTQ+)

- The fact that a child or a young person may be LGBTQ+ is not in itself an inherent risk factor for harm, however, Kendal College recognises that children who are LGBTQ+ or are perceived by other children to be LGBTQ+ (whether they are or not) can be targeted by other children or others within the wider community.
- Kendal College recognises risks can be compounded where children who are LGBTQ+ lack a trusted adult with whom they can be open. LGBTQ+ is included within our Values/Tutorials 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.

5.7 Children who are privately fostered

- [Private fostering](#) occurs when a child under the age of 16 (under 18 for children with a disability) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative in their own home. A child is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer. Such arrangements may come to the attention of our staff through the normal course of their interaction, and promotion of learning activities, with children.
- Where private fostering arrangements come to the attention of Kendal College, we must notify Cumberland or Westmorland and Furness Children's Services in line with the local arrangements in order to allow the local authority to check the arrangement is suitable and safe for the child.

5.8 Homelessness

- Homelessness poses a real risk to a child/young person's welfare. The Homelessness Reduction Act 2017 places a legal duty on local councils to provide those who are homeless or at risk of homelessness with meaningful help, including an assessment of their needs and circumstances, the development of a personalised housing plan and work to help them retain their accommodation or find a new place to live.
- The new duties shift the focus to early intervention and encourages those at risk to seek support as soon as possible before they are facing a homelessness crisis. Children social care are the lead agency in these circumstances.
- Some schools and colleges may also encounter situations whereby some 16-17 olds could be living independently of their parents or guardians and therefore requires different intervention and support.

6. Online Safety

- It is essential that children are safeguarded from potentially harmful and inappropriate material or behaviours online. Kendal College will adopt a whole College approach to online safety which will empower, protect, and educate our learners and staff in their use of technology, and establish mechanisms to identify, intervene in, and escalate any concerns where appropriate.
- Kendal College will ensure online safety is considered as a running and interrelated theme when devising and implementing our policies and procedures, and when planning our curriculum, staff training, the role and responsibilities of the DSL and parent/carer engagement.
- Kendal College identifies that the breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:
 - o Content: being exposed to illegal, inappropriate or harmful content. For example, pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
 - o Contact: being subjected to harmful online interaction with other users. For example, peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
 - o Conduct: personal online behaviour that increases the likelihood of, or causes, harm. For example, making, sending and receiving explicit images (including consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying.
 - o Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams.
- Kendal College recognises that technology and the risks and harms related to it evolve and change rapidly. The College will carry out an annual review of our approaches to online safety, supported by an annual risk assessment, which considers and reflects the current risks our children face online.

- The Principal will be informed of any online safety concerns by the DSL, as appropriate. The DSL will report on online safety practice and incidents, including outcomes, as part of the safeguarding update to the Corporation.

6.1 Policies and Procedures

- The DSL and IT Network Manager have overall responsibility for online safety within the College but will liaise with other members of staff, for example the senior leadership team, IT technicians and Heads of Faculty/Curriculum Leads as necessary.
- The DSL will respond to online safety concerns in line with our safeguarding and other associated policies, including our Acceptable Use Policies, Online Safety and Staff Code of Conduct and Disciplinary 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.
- Kendal 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.
- Kendal College recognises the specific risks that can be posed by mobile and smart technology, including mobile/smart phones, cameras, wearable technology and any other electronic devices with imaging and/or sharing capabilities.
- Kendal College has appropriate Online Safety, BYOD (staff and learners) Acceptable Use Templates which are shared and understood by all members of the community. These policies can be found on the College website.

6.2 Appropriate filtering and monitoring on college devices and networks

- Kendal College will do all we reasonably can to limit children's exposure to online harms through College provided devices and networks and in line with the requirements of the Prevent Duty and KCSIE, we will ensure that appropriate filtering and monitoring systems are in place (Sophos and FastVue systems).
- When implementing appropriate filtering and monitoring, Kendal College will ensure that "over blocking" does not lead to unreasonable restrictions as to what children 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 our approach to online safety and we recognise that we cannot rely on filtering and monitoring alone to safeguard our students; effective safeguarding practice, robust policies, appropriate classroom/behaviour management and regular education/training about safe and responsible use is essential and expected.
 - 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 age, ability and potential risk of harm:

Responsibilities

- The DSL and IT Network Manager have overall strategic responsibility for our filtering and monitoring approaches, including ensuring that our filtering and monitoring systems are regularly reviewed. They ensure the senior leadership team and relevant staff have an awareness and understanding of the appropriate filtering and monitoring provisions in place, manage them effectively and know how to escalate concerns when identified.
- Vickie Williamson and Beth Lowery, members of the senior leadership team and DSLs, and Mark Woof, IT Network Manager, are responsible for ensuring that our college has met the DfE [Filtering and monitoring standards](#) for schools and colleges.
- Our DSL and IT Network Manager are responsible for
 - o procuring filtering and monitoring systems.
 - o documenting decisions on what is blocked or allowed and why.
 - o reviewing the effectiveness of our provision.
 - o overseeing reports.
 - o ensuring that all staff understand their role, are appropriately trained, follow policies, processes and procedures and act on reports and concerns.
 - o ensuring the DSL, the Principal and IT staff have sufficient time and support to manage their filtering and monitoring responsibilities.
- The DSL has lead responsibility for overseeing and acting on:
 - o any filtering and monitoring reports.
 - o any child protection or safeguarding concerns identified.
 - o checks the filtering and monitoring system.
 - o Providing reports and updates to the Corporation on a regular basis.
- The IT staff have technical responsibility for:
 - o maintaining filtering and monitoring systems.
 - o providing filtering and monitoring reports.
 - o completing technical actions identified following any concerns or checks to systems.
 - o working with the senior leadership team and DSL to procure systems, identify risks, carry out reviews and carry out checks.
- All members of staff are provided with an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring as part of our induction process, and in our safeguarding staff training.
- All staff, learners and parents/carers have a responsibility to follow this policy to report and record any filtering or monitoring concerns.

Decision making and reviewing our filtering and monitoring provision

- When procuring and/or making decisions about our filtering and monitoring provision, our senior leadership team works closely with the DSL and the IT staff. Decisions have been recorded (IT helpdesk and web filter audit log) and informed by an approach which ensures our systems meet our College specific needs and circumstances, including but not limited to our learner risk profile and specific technology use.

- Any changes to the filtering and monitoring approaches will be assessed by staff with safeguarding, educational and technical experience and, where appropriate, with consent from the senior leadership team. All changes to the filtering policy are logged and recorded (IT helpdesk and web filter audit log).
- Our College undertakes an annual audit review of our filtering and monitoring systems to ensure we understand the changing needs and potential risks posed to our community.
- In addition, the IT team alongside DSLs undertake regular checks on our filtering and monitoring systems, which are logged and recorded, to ensure our approaches are effective and can provide assurance to the Corporation that we are meeting our safeguarding obligations.
 - These checks are achieved through real time alerts from FastVue which go to both the DSL and the Safeguarding Manager/Deputy DSLs. All alerts are followed up.

Appropriate Filtering

- Kendal College uses JSIC as our internet provider and a range of systems, including FastVue as a filtering and monitoring system.
 - Our internet provider meets the requirements of the [Internet Watch Foundation](#) (IWF) and is signed up to the Counter-Terrorism Internet Referral Unit list (CITRU).
 - Sophos Firewall and FastVue meets the requirements of the Counter-Terrorism Internet Referral Unit list (CTIRU).
 - The Sophos Firewall filter blocks access to illegal content including child sexual abuse material (CSAM).
 - The Sophos Firewall filter blocks access to sites which could promote or include harmful and/or inappropriate behaviour or material. This includes content which promotes discrimination or extremism, drugs/substance misuse, malware/hacking, gambling, piracy and copyright theft, pro-self-harm, eating disorder and/or suicide content, pornographic content and violent material.
- We filter internet use on all College owned, or provided, internet enabled devices and networks. This is achieved by:
 - Sophos filtering and monitoring which is installed on all devices.
 - Our filtering systems should allow us to identify device names or IDs, IP addresses, and where possible, individual users, the time and date of attempted access and the search term or content being blocked.
- Our filtering system is operational, up to date and is applied to all users, including guest accounts, all College owned devices and networks, and all devices using the College internet connection.
- We work with our IT staff to ensure that our filtering policy is continually reviewed to reflect our needs and requirements.

- If there is failure in the software or abuse of the system, for example if learners or staff accidentally or deliberately access, witness or suspect unsuitable material has been accessed, they are required to:
 - Turn off monitor/screen, report the concern immediately to a member of staff, and report the URL of the site to technical staff/services (using helpdesk ticket system).
- Filtering breaches will be reported to the DSL and technical staff and will be recorded and escalated as appropriate and in line with relevant policies, including our safeguarding, acceptable use, allegations against staff and disciplinary policies.
- Parents/carers may be informed of filtering breaches involving their child.
- Any access to material believed to indicate a risk of significant harm, or that could be illegal, will be reported as soon as it is identified to the appropriate agencies, including but not limited to the [Internet Watch Foundation](#) (where there are concerns about child sexual abuse material), the Cumbria Constabulary, [NCA-CEOP](#) or Children's Services.
- If staff are teaching topics which could create unusual activity on the filtering and monitoring logs, or if staff perceive there to be unreasonable restrictions affecting teaching, learning or administration, they will report this to the DSL and/or senior leadership team who will liaise with IT services.

Appropriate Monitoring

- We will appropriately monitor internet use on all College provided devices and networks. This is achieved by our FastVue filtering and monitoring systems.
- All users will be informed that use of our devices and networks can/will be monitored and that all monitoring is in line with data protection, human rights and privacy legislation.
- If a concern is identified via our monitoring approaches:
 - Where the concern relates to learners, it will be reported to the DSL and will be recorded and responded to in line with relevant policies, such as safeguarding, acceptable use, and disciplinary policies.
 - Where the concern relates to staff, it will be reported to the appropriate Director (or chair of governors if the concern relates to the Principal).
- Where our monitoring approaches detect any immediate risk of harm or illegal activity, this will be reported as soon as possible to the appropriate agencies; including but not limited to, the emergency services via 999, Cumbria Constabulary via 101, [NCA-CEOP](#), LADO or Children's Services.

6.3 Information Security and Access Management

- Kendal 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 acceptable use policies and the online safety policy.

- Kendal College will review the effectiveness of our procedures periodically to keep up with evolving cyber-crime technologies.
- Craig Owen, Vice Principal Data and Funding, is responsible for ensuring that our College has met the DfE [cyber security standards](#) for schools and colleges.

6.4 Remote/Online Learning

- Kendal 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; for example, College provided email accounts and phone numbers and Microsoft Teams.
 - 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 disciplinary policy, staff 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 safeguarding and other relevant policies.
- When delivering remote learning, staff will follow our Remote Learning Acceptable Use Policy (AUP).

6.5 Online Safety Training for Staff

- Kendal College will ensure that all staff receive online safety training, which, amongst other things, will include providing them with an understanding of the expectations, applicable roles and their responsibilities in relation to filtering and monitoring, as part of induction.
- Ongoing online safety training and updates for all staff will be integrated, aligned and considered as part of our overarching safeguarding approach. See section 7 for more information.

6.6 Educating Learners

- Kendal 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. See section 9 for more information.

6.7 Working with parents/carers

- Kendal 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.

- Kendal College will ensure parents and carers understand what systems are used to filter and monitor their children's online use at the 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.
- 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.

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 or annex A of the current version of 'Keeping Children Safe in Education' 2024 which covers safeguarding information for staff.
 - College leaders, including the DSL and governors will read KCSIE 2024 in its entirety.
 - Leaders and all College members of staff who work directly with children will read annex B of KCSIE 2024.
 - All members of staff have signed to confirm that they have read and understood the national guidance shared with them. This is undertaken via MyKC and Microsoft Forms and recorded on the Single Central Register.
- 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. All staff are expected to re-read this policy at least annually (and following any updates) to ensure they understand our expectations and requirements.
- All new staff and volunteers (including agency and third-party staff) receive safeguarding training (including online safety, which, amongst other things, will include ensuring an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) to ensure they are aware of the College Internal safeguarding processes, as part of their induction. This training is regularly updated and is in line with advice from the local safeguarding partners. This will be via training from the DSL or Safeguarding Manager/DDSL, e-learning, updates and external agencies, where appropriate.
- All staff members (including agency and third-party staff) will receive appropriate safeguarding training (including online safety) that is updated at least annually, to ensure they are aware of a range of safeguarding issues and how to report concerns. This training is from the DSL.
- 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. Cyber Safety training will be undertaken at least annually.

- In addition to specific safeguarding 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. Updates will be shared through CPD, staff newsletters and email throughout the academic year.
- Kendal 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 policies, through peer to peer discussion and training events.
- All governors receive appropriate safeguarding (including online safety) training at induction. This training equips them with the knowledge to provide strategic challenge to be assured 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 via an annual update.
- The DSL will provide an annual report to the Corporation detailing safeguarding training undertaken by all staff and will maintain an up-to-date record of who has been trained, via the Single Central Register.

7.2 Safer Working Practice

- Our College takes steps as outlined in this and other relevant policies to ensure processes are in place for staff that promote continuous vigilance, maintain an environment that deters and prevents abuse and challenges inappropriate behaviour.
- All members of staff are required to work within our clear guidelines on safer working practice as outlined in the College code of conduct.
- The DSL will ensure that all staff (including contractors) and volunteers are aware of the College expectations regarding safe and professional practice via the staff code of conduct and Acceptable Use Policy (AUP).
- Staff will be made aware of the College disciplinary 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 learners.
- 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 code of conduct, mobile and smart technology, Acceptable Use Policies (AUPs), and social media.

7.3 Supervision and Support

- The induction process will include familiarisation with safeguarding responsibilities and procedures to be followed if members of staff have any concerns about a child's safety or welfare.
- The College will provide appropriate supervision and support for all members of staff to ensure that:

- o All staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children.
 - o All staff are supported by the DSL/Safeguarding Manager in their safeguarding role.
 - o 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 children's welfare or safety can seek support from the DSL/Safeguarding Manager.
 - The DSL/Safeguarding Manager/HR Manager 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 Employee Assistance Programme, or other similar organisations directly.

8. Safer Recruitment and Allegations Against Staff

8.1 Safer Recruitment and Safeguarding Checks

- Kendal 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 students and staff.
 - o Kendal College will follow Part three, 'Safer recruitment' of Keeping Children Safe in Education and relevant guidance from The Disclosure and Barring Service (DBS)
 - o The Corporation and College Senior Leadership team are responsible for ensuring that the College follows safe recruitment processes as outlined within guidance.
 - o The Corporation and College Senior Leadership team 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.
- Kendal College is 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.
- 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 organises work placements, we will follow the advice and guidance as identified in Part three of KCSIE.

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 Part four of KCSIE and the local arrangements.
- Any concerns or allegations about staff will be recorded and dealt with appropriately in line with 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 DSL is unsure how to respond, for example if the College is unsure if a concern meets the harm 'thresholds', advice will be sought via the Local Authority Designated Officer (LADO).
- 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.
- In the situation that the College receives an allegation relating to an incident that happened when an individual or organisation was using our premises for the purposes of running activities for children, we will follow our safeguarding policies and procedures, including informing the LADO.

8.2.1 Concerns that meet the 'harm threshold'

- Kendal College recognises that it is possible for any member of staff, including volunteers, governors, 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.
 - 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 Governors who will contact the LADO.

8.2.2 Concerns that do not meet the 'harm threshold'

- Kendal College may also need to take action in response to 'low-level' concerns about staff. Additional information regarding low-level concerns can be obtained from the College's Human Resources Manager.
- Kendal 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 code of conduct, 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/carer 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 Code of Conduct to the HR Manager.
 - 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.
 - 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 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 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 code of conduct 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 procedures and policy. The senior leadership team at Kendal College will take all concerns or allegations received seriously.
- All members of staff are made aware of the College Whistleblowing procedure. It is a disciplinary offence not to report concerns about the conduct of a colleague that could place a child 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.
- Kendal 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.
 - 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

- Kendal College will ensure that children are taught about safeguarding, including online safety, as part of providing a broad and balanced curriculum. This will include covering relevant issues through the Values/Tutorials curriculum.
- We recognise that the College plays an essential role in helping children 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 students have a range of age-appropriate contacts and strategies to ensure their own protection and that of others.

- Kendal 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.
- Kendal College has a clear set of values and standards, upheld, and demonstrated throughout all aspects of college life which are underpinned by our disciplinary policy and pastoral support system.
- Kendal College recognises that a one size fits all approach will not be appropriate for all children, and a more personalised or contextualised approach, tailored to the specific needs and vulnerabilities of individual children might be needed, for example children who are victims of abuse and children with SEND.
- Our College systems support children 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 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 the College as outlined within national guidance. Visitors will be expected to sign in and out via the reception visitors log and to display a visitor's badge whilst on site.
- Any individual who is not known or identifiable on site should be challenged for clarification and reassurance.
- The College will not accept the behaviour of any individual (parent/carer or other) that threatens 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 Kendal College are made aware of local support available.

Westmorland and Furness Children's Services

Safeguarding Hub: 0300 373 2724

Website: [CSCP](#)

Contact details for the LADO

Telephone: 0300 303 3897

Email: lado@westmorlandandfurness.gov.uk

Cumberland Council Children's Services

Safeguarding Hub: 0333 240 1727

Website: [CSCP](#)

Contact details for the LADO

Telephone: 0300 303 3892

Email: lado@cumberland.gov.uk

Cumbria Constabulary

101 or 999 if there is an immediate risk of harm

Prevent

Email: concern@lancashire.pnn.police.uk

Telephone: 01772 413 398

Appendix 1: Categories 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 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 care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

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
- Low self esteem

Appendix 2: 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

- Employee Assistance Programme: www.healthassured.org/
- Professional Online Safety Helpline: www.saferinternet.org.uk/helpline
- Harmful Sexual Behaviour Support Service: <https://swgfl.org.uk/harmful-sexual-behaviour-support-service>

Support for learners

- 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/>

Children with Family Members in Prison

- National information Centre on Children of Offenders (NICCO): www.nicco.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
- Multi-agency practice principles for responding to child exploitation and extra-familial harm: <https://tce.researchinpractice.org.uk/>

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/496415/6_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
- Centre of expertise on Child Sexual Abuse: www.csacentre.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/online-safety
- Get Safe Online: www.getsafeonline.org
- Parents Protect: www.parentsprotect.co.uk
- Cyber Choices:
<https://nationalcrimeagency.gov.uk/what-we-do/crime-threats/cyber-crime/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
- Kooth: Kooth.com
- 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

CSCP Early Help Online Directory of Services to Support Families

<https://www.cumbriasafeguardingchildren.co.uk/professionals/supportandservicesforfamilies/earlyhelpsupportservicesfamilies.asp>

Appendix Three: Early Help Pathway

Early help means providing support as soon as a problem emerges and relies on local organisations and agencies working together

Child/young person or family have additional needs, emerging needs or their needs are unclear
Refer to the Cumbria Threshold Guidance

Discuss concerns with the designated or deputy safeguarding lead:

- What are we worried about?
- What is the impact for the child/young person
- What action have taken?

Additional advice and guidance is available from the Early Help Team, **you do not need consent to discuss concerns**

Early Help Team advice is no referral and **setting continue** to support **child/young person** and family to resolve concerns

Threshold for Early Help Assessment met

Consent to a referral is refused the **setting** must continue to support and monitor. The [Early Help Online Directory of Services to Support Families : Cumbria County Council \(cumbriasafeguardingchildren.co.uk\)](#) can assist you to find the right the support to help children/young people and their families

Consent to make a referral for Early Help
you must seek the consent of a parent or young person over 13 years old who has capacity, to share their information with another service.

More information and guidance on information sharing can be found [here](#)

If concerns continue to escalate and the family refuse to engage in early help the designated safeguarding lead should consider next steps and whether the threshold for a child in need or child protection (Level 4) referral in consultation with Children's Social Care has been reached

An Early Help Assessment - Signs of Well-being and Success (EHA) will be initiated, registered, a Team Around the Family (TAF) developed and Team Around the Family meetings put in place. An identified person will coordinate the assessment and monitor the impact of the whole family plan to address concerns

Where complex and multiple needs emerge, additional support can be sought from the Early Help and Family Support Panels

Further details of support and help can be accessed [here](#)