

Title: Safeguarding Policy

Responsible: Chief Operating Officer/Designated Safeguarding Lead

Due for Revision: August 2025 or in line with legislative changes

Status: Released

Location: KI Connect

1. Introduction

1.1 What is Safeguarding?

Kaplan International (KI) Pathways recognises its responsibility to safeguard and promote the welfare of minors within the legal framework. KI Pathways is committed to ensuring a safe and supportive environment exists for all staff, students, and visitors. Safeguarding is defined by statutory guidance *Keeping children safe in education (2022)* as “*protecting children from maltreatment; preventing impairment of children’s health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes*”.

2. Who are we safeguarding?

Safeguarding practices are normally applied to vulnerable groups including minors and young people under the age of 18. The Children Act 2004 defines a child as anyone under the age of 18. The management of Health & Safety Regulations 1999 regard a “child” as a person who is not over the minimum College leaving age and a “young person” as a person who has not attained the age of 18 (17years in Scotland). For this policy, a “child is under 16 and a ‘young person’ is over 16 but under 18 (17years in Scotland). Both minors and young people are included in this policy.

KI Pathways are aware that many minors and young people are the victims of different kinds of abuse and that they can be subjected to social factors that have an adverse impact upon their lives. We aim to create a safe environment within which minors and young people can thrive and adults can work with the security of clear guidance.

KI Pathways recognises that international students may be more vulnerable on account of their distance from normal sources of personal support and their unfamiliarity with British culture and that the KI Pathways therefore has enhanced duty of care in respect of these students and particularly those under 18 or otherwise vulnerable.

KI Pathways require all students who are under 18 to have a guardian that lives in the UK. Parents can either book a professional guardian service or nominate a relative or family friend. KI Pathways requires guardians to carry out the following duties:

- Guardians must live in the UK for the duration of the student’s course, be over 21 and be prepared to submit their contact details to KI Pathways on enrolment.
- Expected to liaise with and update parents about student performance or concerns by the College
- Engage with the College over student performance or issues.

Guardians may be vetted by the College and the College has the right to ask parents to allocate an alternative UK guardian if they are deemed unsuitable by the College.

KI Pathways reserves the right to inform the parents, guardian, and other statutory bodies (e.g., UKVI) of each student's progress, attendance, and any other concerns or issues with non-compliance. but will always listen to the full circumstances and treat each one on a case-by-case basis.

3. Why is safeguarding necessary in further education?

Private ELT and other pre-university/pathway colleges have a statutory duty to safeguard and protect young people in their care.

KI Pathways has a growing number of minors who come from very diverse nationalities. Exposure to a variety of views, customs, practices, and behaviours is part of the value of the pathway education experience. However, while preserving the freedom of the individual and freedom of speech, the College has a duty to protect all members of its community from harassment on the grounds of any protected characteristic as defined in the Equalities Act 2010, from bullying and from extremist influences liable to infringe the dignity or freedom of choice of individuals.

4. Purpose

The purpose of this document is to specify KI Pathways Policy for the safeguarding of minors and adults who may be considered vulnerable. KI Pathways aims to adopt the highest possible standards and to take all reasonable steps in relation to the safety and welfare of all vulnerable groups in the course of its work. KI Pathways will not tolerate the abuse, neglect and misuse of anyone.

This Policy is based on and incorporates elements of the following legislation and national guidance documents (including but not limited to):

- The Children Act 1989
- The Data Protection Act 2018
- The Human Rights Act 1998
- Protection of Children Act 1999
- Working Together to Safeguard Minors 2023
- Sexual Offences Act 2003
- Safeguarding Vulnerable Groups Act 2006
- Protection of Freedoms Act 2012
- Children Act 2004
- Disclosure and Barring Service Guidance documents
- Counter Terrorism & Security Act 2015

- Every Child Matters Initiative 2018
- [Working Together to Safeguard Children 2023](#)
- [Keeping Children Safe in Education 2024 \(KCSIE 2024\)](#)
- Guidance for safer working practice for those working with children and young people in education settings 2024

5. Scope

The Safeguarding policy applies to everyone working and attending KI Pathways. It confers responsibilities on all staff, students, agency staff and volunteers, contractors, visitors, consultants and those working under self-employed arrangements who in the course of their duties:

- i. Engage in regulated activity relating to minors and regulated activity relating to adults (or who supervises anyone engaged in such regulated activity).
- ii. May have contact with vulnerable groups to include but not limited to, regular and scheduled meetings, regular chance encounters and one-to-one meetings.

Where a partner university of the embedded Pathways of KI Pathways exists, College staff should refer to this policy in the first instance when dealing with any concerns or procedures.

5.1 Definitions

Child- a person under the age of 18 years.

Adults at Risk - this Safeguarding Policy also includes safeguarding arrangements for students who are considered adults at risk. Under the UK Care Act 2014, an adult at risk is someone over 18 years old who:

- is experiencing or is at risk of abuse or neglect.
- has needs for care and support (whether or not the authority is meeting any of those needs); and
- as a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it.

Students over the age of 18, whilst not meeting the definition of an adult at risk, may be considered potentially vulnerable and may require additional support and assistance to assist them in ensuring their own well-being and safety

Types of situations from which students should be safeguarded include, but are not limited to, the following:

- Financial exploitation
- Sexual abuse or exploitation
- Physical abuse
- Emotional/Psychological abuse
- Recruitment to radical extremist organisations
- Enticement into illegal activities
- Domestic violence

Regulated activity relating to children includes regular unsupervised contact with under 18's such as teaching; training; instructing; caring for; personal care for; supervising; providing advice and guidance on well-being; and driving a vehicle only for minors or work for 'specified places' with opportunity for contact. Specified places can include schools, childcare premises. **Regular** contact is defined as "carried out by the same person frequently (once a week or more often) or on 4 or more days in a 30-day period, or overnight".

Regulated activity relating to adults includes provision of healthcare, personal care, and/or social work, assistance with general household matters and/or in the conduct of the adult's own affairs; and/or an adult who is conveyed to, from, or between places, where they receive healthcare, relevant personal care or social work because of their age, illness or disability.

KI Designated Safeguarding Lead (DSL), who has overall accountability and strategic responsibility for safeguarding vulnerable groups within the company, is the Senior Director of Compliance & Accreditation at Kaplan International

College/Kapan Living Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Lead (DDSL) have operational responsibility for safeguarding vulnerable groups within their College/Kapan Living and carry out leadership and co-ordination role are appointed by the College Director. They are supported in this role by other staff to whom responsibility may be delegated from time to time.

Safeguarding: a term which relates to actions taken to promote the wellbeing of children and vulnerable adults and protect them from harm. Safeguarding is everyone's responsibility. Safeguarding applies if a child or a vulnerable adult is experiencing or at risk of abuse and neglect.

Care and support needs: Where because of mental or physical illness, physical or intellectual disability or frailty, practical support, also known as social care services, is needed.

Prevent Duty - Part of the UK Government's counter terrorism initiative.

6. Statement of Policy

- I. The policy provides generic guidance for all members of KI Pathways. KI Pathways undertakes to review this policy and keep up to date with new legislation to ensure it is fit for purpose.
- II. KI Pathways aims to provide a safe and secure environment for all students, staff and individual visitors who access its facilities and services. This includes protecting the freedom and dignity of the individual to the extent that it does not interfere with the freedom and dignity of others or undermine community cohesion.
- III. KI Pathways recognises its responsibility to safeguard the wellbeing of vulnerable groups including children and young people engaged in the breadth of KI Pathways activities by ensuring that there are appropriate arrangements in place to enable it to discharge its duty to provide a safe and secure environment.
- IV. KI Pathways recognises that it has a duty to report suspected abuse of any child, young person or vulnerable adult whether that person is a member of KI Pathways community also if a concern is reported to a member of staff in the course of their normal duties.
- V. KI Pathways seeks to ensure that its policies and procedures comply with statutory duties and Child Protection Act, and Safeguarding Vulnerable Groups Act 2006 reflect guidance and good practice in safeguarding minors, young people and vulnerable adults, and that safeguarding arrangements are proportionate and based upon common sense.
- VI. KI Pathways recognises that it has a duty to help staff and students (through guidance, support and training), to promote safe working practices to minimise risk to vulnerable individuals and protect staff and the institution from the possibility of fake allegations. It is not intended that staff should be restricted from normal ways of working, but staff are advised to consider how an action may be perceived.
- VII. KI Pathways ensures that we practise safer recruitment in checking the suitability of staff to work with young people, in accordance with the guidance given in KCSIE (2022) Please refer to The Safeguarding DBS/PVG Guidance.
- VIII. KI Pathways ensures that, where members of staff from other organisations are working with our students on another site, we have received assurances that appropriate child protection checks and procedures apply to those members of staff; and follow the local inter-agency procedures of the Safeguarding Children Partnership and contributing to inter-agency working.
- IX. KI Pathways will assess the risk of children or adults being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology, based on an understanding

of the potential risk in the local area and identify children or adults who may be vulnerable to recruitment to radical extremist organisations and know what to do when they are identified.

- X. KI Pathways will support students in need through early intervention and, where appropriate, support them in cooperation with multi-agencies who are working to the Common Assessment Framework (CAF) and as part of the Team around the Child (TAC) approach.
- XI. KI Pathways will support students who have been abused in accordance with their agreed child protection plan and be alert to the needs of students with medical and mental health conditions.
- XII. KI Pathways will operate robust and sensible health and safety procedures.
- XIII. KI Pathways teach students about safeguarding, for example through use of the VLE and other online resources, through the curriculum, together with guidance on adjusting behaviour to reduce risks including the safe use of electronic devices and the internet.
- XIV. KI Pathways will take all practicable steps to ensure that college premises are as secure as circumstances permit and operate clear and supportive policies on drugs, alcohol and substance misuse; and ensure that any deficiencies or weaknesses in our child protection and safeguarding procedures are remedied without delay.
- XV. All staff members of the college/Kaplan Living as well as every volunteer who assists the college is under a general legal duty to:
 - Always consider the best interests of the student and take action to enable all students to have the best outcomes.
 - Protect students from harm or abuse
 - Be aware of safeguarding policies and child protection procedures and follow them
 - Know how to access and implement the procedures, independently if necessary.
 - Keep a sufficient record of any significant complaint, conversation or event; and
 - report any matters of concern in accordance with this policy.
- XVI. The UK Pathways Safeguarding SMT has the responsibility to ensure the UK Pathways business, including activities undertaken by contracted 3rd parties, are working within the requirements of applicable safeguarding legislation and guidance and the KI Pathways Safeguarding & Prevent Policy and oversees continued improvement to enhance safeguarding practices within UK Pathways. The SMT has oversight of the integrated safeguarding practices between the UK Pathways Colleges. The SG SMT ensures safeguarding practices across UK Pathways are embedded and consistent across locations in the work and responsibilities of all staff and systems and processes of day-

to-day operations complying with relevant law and guidance and the KI Pathways Safeguarding & Prevent Policy.

- XVII. If staff do become aware of or see signs of conflict, aggressive or extreme behaviour or opinions held by a student or group of students consult with the Head of College Services and the College Director.
- XVIII. When the college/Kaplan Living residence identifies an issue with a student affecting safeguarding or studies, the college will seek to implement appropriate support. Colleges/Kaplan Living may seek external advice and refer to available professional services. In instances where there is a recurring problem due to physical or mental health issues, the college will decide on appropriate ongoing support in the student's best interest.

7. Safeguarding structure and responsibilities

KI Pathways has in place an organisational structure for safeguarding vulnerable groups including minors and young people.

Designated Safeguarding Leads

- I. KI Pathways Designated Safeguarding Officer (DSL), who has overall accountability and strategic responsibility for safeguarding vulnerable groups within the company, is the Senior Director, Compliance & Accreditation.
- II. College/Kaplan Living Safeguarding Leads (DSL), who have operational responsibility for safeguarding vulnerable groups within their college and carry out leadership and co-ordination role are appointed by the College Director. The DSLs are supported in this role by other staff to whom responsibility may be delegated from time to time.
- III. The college ensures that reasonable steps to promote and safeguard the welfare of young people and vulnerable adults are taken by the College Director, DSL and all other members of staff
- IV. DSLs shall be given the time, funding, training, resources, and support to enable them to support other staff on safeguarding matters, to contribute to strategy discussions and/or interagency meetings and to contribute to the assessment of students.
- V. While all members of staff have a duty to safeguard students and vulnerable young people, as well as to promote their welfare, any child protection concerns should be communicated to the DSL, who is the first point of contact for parents/guardians teaching and non-teaching staff and any other relevant people. Unless the allegation concerns a member of staff or volunteer in which case the procedures in *Appendix D Allegations Against Members of Staff or Volunteers or another student below should be followed*. Parents can report to the DSL on the welfare of any student in the college

or Kaplan Living residence, whether these concerns relate to their own child or any other child. If preferred, parents may discuss concerns with the student's tutor or other member of staff, who will notify the DSL in accordance with these procedures. It is expected that the DSL will then discuss all concerns with the DSL.

A full list of the responsibilities of the DSL/ DSL based [Keeping Children Safe in Education](#). In summary they are to:

- Be a first or early point of contact for parents, students, teaching and non-teaching staff and external agencies in all matters of child protection and to provide support, advice and expertise on all matters concerning safeguarding.
- Co-ordinate KI Pathways child protection procedures and to review and update regularly the procedures and implementation of the procedures, working with the KI Pathways SMT as necessary.
- Encourage a culture, amongst all staff, of listening to young people and consider their wishes and feelings, to any measures the college or Kaplan Living residence may put in place to keep them safe.
- Ensure that all members of staff and volunteers receive the appropriate training on child protection, to keep and maintain records of this training and to ensure that staff are aware of training opportunities and the latest local policies on safeguarding.
- Keep detailed, accurate, secure written records of concerns or referrals.
- Monitor the confidentiality and storage of records relating to child protection.
- Monitor the operation of this policy.
- Liaise promptly with other agencies, including children's social care and the Local Authority Designated Officer (LADO), the police (if a criminal matter) and the Disclosure and Barring Service, on behalf of the college.
- Monitor records of students in the college who are subject to a child protection plan, to ensure that this is maintained and updated as notification is received
- Where appropriate, take part in child protection conferences or reviews; and
- Advise and act promptly upon suspicion, belief or evidence of abuse reported to them, and keep the DSL and College Director informed of all actions, unless the College Director is the subject of a complaint.

DSLs regularly update their professional knowledge and skills by engaging with developments in safeguarding throughout the academic year; and they undergo formal training at two yearly intervals in line with Local Authority guidance. This training is

provided by an approved agency and covers child protection, inter-agency working in locally agreed procedures, participation in child protection conferences, supporting children in need, identifying children at risk of radicalisation, record-keeping and promoting a culture of listening to children.

8. Control Measures/Procedures

Students

- I. KI Pathways takes a risk management approach to safeguarding vulnerable groups, in organising learning and teaching, and delivery of services to students and the public. Colleges, Kaplan Living residences, and services are required to carry out risk assessments, and make reasonable, proportionate adaptations to their activities. Whilst this is a standalone policy, it is integral to our Under 18's Policy and should be applied as an extension to the College's current and established safeguarding procedures that cover this area.
- II. KI Pathways reserves the right to refuse to admit vulnerable person to a programme of study, or other managed activities, if it judges that the adaptations necessary to safeguard that individual's wellbeing go beyond what is reasonable and proportionate. A decision to refuse admission must be authorised by the Chief Operating Officer and or Director of Admissions.
- III. Where adaptations are reasonable and proportionate, the KI Pathways then puts in place a number of 'control measures' to safeguard the wellbeing of vulnerable groups.

Staff

- i. All KI Pathways staff, contractors and volunteers are advised to minimise physical contact with students, except for the reasons of health and safety, or where physical contact of the provision of personal care (e.g., volunteers working as carers to disabled students).
- ii. KI Pathways has a responsibility for the safety of the learning community, and therefore reserves the right to deny employment where DBS disclosures suggest that they may pose a threat to that community.
- iii. KI Pathways reserves the right, in accordance with its employment procedures to suspend and/or dismiss staff members from employment or from undertaking a specific role to that employment (e.g., academic staff acting as personal tutor). This may be in circumstances where the individual acquires or extends a relevant criminal record, or where they have withheld information about their criminal record at the point of employment. Disciplinary action may also be taken against staff, in

accordance with the KI Pathways employment procedures, for failure to comply with this policy.

- iv. KI Pathways recognises its responsibility for the wellbeing of staff and encourages staff to declare any disability and discuss the need for any reasonable adjustments with HR.
- v. KI Pathways, contractors and volunteers are reminded of the offence of abuse of trust under sections 16 to 19 of the Sexual Offences Act 2003, which makes it an offence for a person aged 18 or over intentionally to behave in certain sexual ways in relation to a child aged under 18, where the person aged 18 or over is in a position of trust and looking after a child aged under 18. A person “looks after” a child in this context if he/she is regularly involved in caring for, training, supervising, or is in sole charge of a child or children.

8.1 Safe Recruitment

All prospective members of staff undergo DBS checks and will also be subject to the other checks required under the Education (Independent School Standards) Regulations (2014) and in accordance with Keeping Children Safe in Education (2024). For further guidelines on safe recruitment please refer to Appendix E.

DBS checks of Staff and Students

KI Pathways is registered with the Disclosure and Barring Service (DBS) and will ensure that all staff who have substantial contact with minors will be checked for relevant criminal convictions whenever appropriate and possible within the constraints of legislation. An enhanced disclosure will normally be required. KI Pathways considers all staff working in colleges and Kaplan Living to be engaged in regulated activity.

The application of rigorous procedures for the recruitment of any staff who come into contact with students, both directly and indirectly, can reduce the likelihood of allegations of abuse being made

The KI Pathways obtains enhanced and portable DBS disclosure for all staff and volunteers working in “regulated positions” (as defined by the Criminal Justice and Court Services Act 2000). KI Pathways has procedures to evaluate information about any staff members or volunteer’s criminal record, and making sensible, fair and consistent judgements about whether the individual is safe to engage (or remain engaged) in the employment role, office or voluntary activity.

The college completes DBS checks of all staff that come into contact with students. As they are in a position of trust, they have been made aware that they have a duty of care for all students.

External Organisations

Persons working in regulated position who are not directly employed by KI Pathways but are employed by contractors (or sub-contractors) or by the HEP partner will also require DBS disclosures. However, these checks will have to be carried out by their employer. KI Pathways will ensure that these obligations are reflected where possible in any contract between the individual KI Pathways and the contractor, as a minimum requirement Kaplan should have in writing these checks have been carried out. Contract staff without such clearance will not be permitted unsupervised access to minors under any circumstances.

Other groups

Where minors of students, staff members or visitors are present on the KI Pathways campus, they remain the responsibility of their parent/guardian or those acting in loco parentis.

Safeguarding the wellbeing of minors visiting the campus (without their parent/guardian) is the responsibility of the organiser of the activities in which the child is participating.

9. Staff Training

Staff training encourages all members of staff to maintain an attitude of '*it could happen here*' where abuse is concerned. All members of staff, including the College Director, have child protection training which is updated regularly in accordance with local Safeguarding Children Partnership Board guidance and procedures. Such training is arranged by the DSL and or the Compliance team, and delivered through a combination of online training, email updates, and the completion of relevant e-courses. In college should the DSL be absent, a designated member of the SMT will assume temporary responsibility. Outside of college hours and during out of term activities, a designated member of the SMT will assume temporary responsibility.

Staff training incorporates opportunities for checking and consolidating their understanding. Staff can also access all safeguarding policies and further associated policies and statutory guidance in the staff section of the college's VLE, and KI Connect the college continually assesses the appropriate level and focus for staff training in specific safeguarding concerns such as radicalisation and child sexual exploitation. All SMT members will receive appropriate training to enable them to fulfil their safeguarding responsibilities. Training for all staff is currently held on GHC platform.

We encourage further relevant training with EUK and/or the LCSB wherever relevant and available. The DSL and all DSL's are trained to specialist level specific to the pathways industry. All the other members of the school management team and all members of the accommodation and welfare team should be trained to specialist level either via a face-to-face training session, the appropriate course at their LSCB (formerly levels 2 or 3) or an online course. It is aimed that all staff will have a refresher

safeguarding training every two years either at, or above, their current level. Reminders for completion of safeguarding training are sent by the Compliance Team

10. Duties of the DSL and DDSL on receiving information about possible abuse

If a suspicion or complaint of abuse is made, the DSL in collaboration with the College Director must decide upon the action to be taken, bearing in mind:

- The inter-agency procedures of the local college's Safeguarding Children Partnership Board
- Where relevant, local information sharing protocols relating to Channel referrals
- The nature and seriousness of the complaint
- That, if the complaint involves serious harm, the police and/or children's social care should always be contacted from the outset
- The best interests of the child
- The child's wishes or feelings; and
- Issues of confidentiality, so far as applicable

11. Making referrals

Responsibility for referral decisions rests with KI DSL, College DSL and the Chief Operating Officer. The decision-making process will be in line with local referral thresholds published by the college's local Safeguarding Children Partnership Board. The referral procedures to be followed are determined by the nature of the disclosure being made.

The key determinant as to which procedure is to be followed is whether the child is:

- in need or
- at risk of suffering harm.

In circumstances where a student has not suffered and is not likely to suffer significant harm but is in need of additional support from one or more agencies, the DSL and or DSL will, when the concern is identified, immediately liaise with the children's social services department where the child lives.

The college in collaboration with DSL will coordinate with the local inter-agencies involved as part of the Common Assessment Framework and the team around the child approach. If there is room for doubt as to whether a referral should be made, the DSL and or DSL will consult with children's social care on a no-names basis without identifying the family. However, as soon as sufficient concern exists that a student may be at risk of harm or in immediate danger, a referral to children's social care and/or the police will be made immediately by the DSL or DSL. The college is not required to obtain parental consent prior to a referral being made to statutory agencies. If the initial referral is made by telephone, the DSL should confirm the referral in writing within 24 hours. If no response

has been received within three working days, the DSL must contact children's social care again.

Where relevant, the college will co-operate with the partner University, Channel Panel and the police in providing any relevant information so that each can effectively carry out its functions to determine whether an individual is vulnerable to being drawn into terrorism. The college will respond to requests for information from the police promptly (see the Prevent Policy). Any member of staff may refer a matter to children's social care directly; this could happen in exceptional circumstances such as in an emergency or if there is a genuine concern that appropriate action has not been taken.

12. External agencies

When the college decides to refer a particular complaint of abuse to social services or the police, the parents and student will be informed in writing of their right to make their own complaint or referral to social services or the police, where appropriate, and will be provided with contact names, addresses and telephone numbers.

13. Students Missing from Education

All staff are informed of the separate procedure to be used for searching for, and if necessary, reporting, any student missing from college. The procedure includes the requirement to record any incident, the action taken, and the reasons given by the student for being missing.

All staff should be aware that children going missing, particularly repeatedly, is a potential indicator of a range of safeguarding issues such as: neglect, sexual abuse or exploitation, child criminal exploitation, mental health problems, substance abuse, travelling to conflict zones, female genital mutilation or forced marriage. The College has clear procedures in place for following up on unexplained absences and, where necessary, reporting to the local authority students who are missing from College for more than 10 school days (continuous). The procedure includes the requirement to record any incident, the action taken, and the reasons given by the student for being missing.

14. Whistleblowing

Whistleblowing is an important aspect of a safeguarded institution where staff and volunteers are encouraged to share concerns about a colleague's behaviour in confidence, with the DSL, line manager or senior manager or Head Office HR as appropriate.

Working with vulnerable groups including children and young people places staff and volunteers in positions of power. In order to retain the trust of vulnerable people, it is essential that all reasonable steps are taken to ensure this power is exercised responsibly.

There may be situations where staff or volunteers have concerns about the conduct of a colleague towards a participant. All members of KI Pathways have the right and the responsibility to raise concerns, without prejudice to their own position, about the behaviour of staff, managers, volunteers, students or others, which may be harmful to those in their care and will receive appropriate support when doing so.

Whistleblowing should be part of transparent work practices and is not intended to set up mistrust or suspicion among staff and volunteers. Refer to Kaplan's Whistleblowing Policy for further details. Please see Appendix H for a checklist on Whistleblowing.

15. Secure college premises

The college will take all practicable steps to ensure that college premises are as secure as circumstances permit. A Visitors' Book is kept at Reception. All visitors must sign in on arrival and sign out on departure and are escorted whilst on college premises by a member of staff. All visitors will be given a name badge with the title "Visitor", which must be clearly displayed and worn at all times whilst on the college premises. Where CCTV operates at a college, please refer to the CCTV policy for further information

16. Confidentiality and information sharing

KI Pathway Colleges will keep all child protection and other adult records confidential, allowing disclosure only to those who need the information in order to safeguard and promote the welfare of children and adults. The College will cooperate with police and children's social care to ensure that all relevant information is shared for the purposes of child protection investigations under section 47 of the Children Act 1989 in accordance with the requirements of *Working Together to Safeguard Children (2018)*, the *Prevent Duty Guidance for England and Wales* and *Channel Duty Guidance: Protecting all vulnerable children or adults who could potentially be recruited to radical extremist organisations from being drawn into terrorism*. Any referrals to these bodies or if allegations have been made against staff, the college and DSL will consult with the Local Authority Designated Officer and, where appropriate, with the police, social services, the Prevent Regional Coordinator, Police Prevent or Channel Coordinator. KI Pathways will share only sufficient and relevant information in order to allow the concern to be appropriately followed up. Information sharing will only take place with external authorities when this is consistent with the provisions of the Data Protection Act (1998).

Any child protection incidents at the college will be followed by a review of the safeguarding procedures in the college and a report to the SMT and KI Pathways SMT. Where an incident involves a member of staff, the Local Authority Designated Officer will be asked to assist in this review to determine whether any improvements can be made to the college's procedures. The DSL will monitor the operation of this policy and the College's internal safeguarding procedures and present an annual report to the SMT and KI Pathways SLT. Any deficiencies or weaknesses in child protection and safeguarding arrangements identified at any time will be remedied without delay.

17. Other relevant policies

The Safeguarding policy has referred to several other policies that should be read in conjunction with this policy for more detailed information on areas:

- Anti-Bullying Policy
- Alcohol & Drug Policy
- Under 18 Policy
- Health and Safety Policy
- Recruitment Policy
- Safeguarding DBS PVG Guidance
- Code of Conduct for Staff
- E-Safety Policy
- Web Filtering and On-line Safety Policy
- Whistleblowing Policy
- Missing Student Policy
- Major Incident Policy
- Prevent Duty Policy
- Red & Yellow Alert Policy
- CCTV policy
- Acceptable Use Policy
- Student Bullying Harassment and Sexual Misconduct Policy
- Supervision for Safeguarding Policy
- Staff and Student Relationship Policy

Appendix A

Guidelines for Recognising Signs of Abuse

It can often be difficult to recognize abuse. The signs listed in these guidelines are only indicators and many can have reasonable explanations. Students may behave strangely or seem unhappy for many reasons, as they move through the stages of lives, or their families experience changes. It is nevertheless important to know what could indicate that abuse is taking place and to be alert to the need to consult further.

Someone can abuse a student by actively inflicting harm or by failing to act to prevent harm. Abuse can take place within a family, in an institutional or community setting, by telephone or on the internet. Abuse can be carried out by someone known to a student or by a stranger.

If you are worried about a student, it is important that you keep a written record of any physical or behavioural signs and symptoms. In this way you can monitor whether a pattern emerges and provide evidence to any investigation if required.

Physical Abuse

Physical abuse can involve hitting, shaking, throwing, poisoning, burning, scalding, drowning, and suffocating. It can also result when a parent or carer deliberately causes the ill health of a student in order to seek attention; this is called fabricated illness. Symptoms that indicate physical abuse include:

- Bruising in or around the mouth, on the back, buttocks or rectal area
- Finger mark bruising or grasp marks on the limbs or chest of a small child
- Bites
- Burn and scald marks; small round burns that could be caused by a cigarette
- Fractures to arms, legs or ribs in a small child
- Large numbers of scars of different sizes or ages

Emotional Abuse

Emotional abuse happens when a student's need for love, security, praise and recognition is not met. It usually co-exists with other forms of abuse. Emotionally abusive behaviour occurs if a parent, carer or authority figure is consistently hostile, rejecting, threatening or undermining. It can also result when the student is prevented from social contact with others, or if developmentally inappropriate expectations are imposed upon them. It may involve seeing or hearing the ill-treatment of someone else. Symptoms that indicate emotional abuse include:

- Excessively clingy or attention-seeking behaviour
- Very low self-esteem or excessive self-criticism
- Excessively withdrawn behaviour or fearfulness; a 'frozen watchfulness'
- Despondency
- Lack of appropriate boundaries with strangers; too eager to please
- Eating disorders

Neglect

Neglect is the persistent failure to meet a child/person's basic physical and/or psychological needs, causing damage to their health and development. It may involve a parent or carer failing to provide adequate food, shelter or clothing, failing to protect a child/person from harm or danger, or failing to access appropriate medical care and treatment when necessary. It can exist in isolation or in combination with other forms of abuse. Symptoms of physical and emotional neglect can include:

- Inadequate supervision; being left alone for long periods of time
- Lack of stimulation, social contact or education
- Inadequate nutrition, leading to ill-health
- Constant hunger; stealing or gorging food
- Failure to seek or to follow medical advice such that a child's life or development is endangered
- Inappropriate clothing for conditions

Sexual Abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, whether the child/person is aware of what is happening. This may include physical contact, both penetrative and non-penetrative, or involve no contact, such as watching sexual activities or looking at pornographic material. Encouraging children/young people to act in sexually inappropriate ways is also abusive. Under the Sexual Offences Act 2003, any sexual activity – contact or non-contact – with a child under the age of 13, is a crime. Symptoms of sexual abuse include:

- Allegations or disclosure
- Sexually transmitted diseases; urinary infections
- Excessive preoccupation with sexual matters; inappropriately sexualized play, words or drawing
- A child/young person who is sexually provocative or seductive with adults
- Repeated sleep disturbances through nightmares and/or wetting

Older minors and young people may additionally exhibit:

- Depression
- Drug and/or alcohol abuse
- Eating disorders; obsessive behaviours
- Self-mutilation; suicide attempts
- College/peer/relationship problems

Some members of our communities hold beliefs that may be common within particular cultures, but which are against the law in the UK. KI Pathways does not condone practices that are illegal or harmful to children/young people. Examples of particular practices are:

Forced Marriages

No faith supports the idea of forcing someone to marry without their consent. This should not be confused with arranged marriages between consenting adults.

- Under-age Marriages

In the UK, a young person cannot legally marry or have a sexual relationship until they are 16 years old or more.

Female Circumcision

This is against the law, yet we know that for some in our communities it is considered a religious act and a cultural requirement. It is also illegal for someone to arrange for a child to go abroad with the intention of having her circumcised.

Ritualistic Abuse

Some faiths believe that spirits and demons can possess people (including children). What should never be condoned is the use of any physical violence to get rid of the possessing spirit. This is physical and emotional abuse and people can be prosecuted even if it was their intention to help the child.

Radicalisation

Radicalisation is a process where a person, often from a vulnerable background begins to adopt extreme political, religious, or social view(s) and through these - engage in extremist activity. Their views will often be formed through misguidance, misunderstanding, jealousy, anger, a 'sense of injustice', resentment or fear.

The following are some signs that could mean somebody could be at risk of radicalisation or is going through a radicalisation process:

Physical changes:

- Sudden or gradual change in physical appearance
- Sudden or unexpectedly wearing religious attire
- Getting tattoos displaying various messages
- Unexpectedly growing a beard
- Unexpectedly shaving their head (skinhead)
- Possesses unexplained gifts and clothing (groomers will sometimes use gifts such as mobile phones and clothing to bribe a young person)

Social changes:

- Cuts ties with their friends, family or community
- Starts to become socially withdrawn
- Becoming dependent on social media and the internet
- Begins to associate with others who hold radical views
- Bullies or demonises other people freely
- Begins to attend rallies and demonstrations for extremist causes
- Associates with known radicals
- Visits extremist websites, networks and blogs

Emotional Changes

- Begins to complain, often with anger, about governmental policies, especially foreign policy
- Advocates violence or criminal behaviour
- Begins to believe in government conspiracies
- Exhibits erratic behaviour such as paranoia and delusion
- Speaks about seeking revenge
- Starts to exhibit extreme religious intolerance
- Demonstrates sympathy to radical groups

- Displays hatred or intolerance of other people or communities because they are different

Appendix B

Guidelines for Arrangements for peer-on-peer abuse and allegations

All staff should be aware that safeguarding issues can manifest themselves via peer-on-peer abuse. This is most likely to include, but is not limited to, bullying (including cyberbullying), sexual violence and sexual harassment; physical abuse such as hitting, shaking, biting, hair pulling, or otherwise causing physical harm; sexting and initiating/hazing type of violence and rituals. Sexual violence and sexual harassment can occur between students of any age and sex. However, staff should be aware that some groups are at greater risks than others. Girls, students with SEND and LGBT students are more likely to be victims of these types of abuse. Sexual violence includes acts such as sexual assault, assault by penetration, and rape. A key feature of such acts is that the sexual activity takes place without the consent of the victim. Consent can only be given if an individual has the freedom and capacity to choose to participate in a sexual act. Sexual harassment refers to 'unwanted conduct of a sexual nature' and can occur online and offline.

Sexual harassment can take a wide variety of forms:

- Sexual comments e.g., making lewd comments or sexualised remarks about a person's clothes or appearance, using sexualised names etc.
- Physical behaviour e.g., deliberately brushing against someone, interfering with clothing, displaying pictures, drawings or photos of a sexual nature; and
- Online harassment e.g., non-consensual sharing of images and videos, unwanted sexualised comments and messages.

KI Pathways has an important role in developing students' understanding of what constitutes peer-on-peer abuse and instilling behavioural norms that minimise the risk of it taking place. With this in mind, staff should be aware of the importance of:

- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- Not tolerating or dismissing sexual violence or sexual harassment as "banter", "just having a laugh" or "boys being boys"; and
- Robustly challenging behaviours, such as grabbing bottoms, breasts, genitalia, flicking bras and lifting up skirts (up skirting) Note: Up skirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks for sexual gratification, or to cause humiliation or distress. Up skirting is now a criminal offence.

Other strategies in place to prevent the occurrence of peer-on-peer abuse include:

- Providing developmentally appropriate lessons which develop students' understanding of acceptable behaviour and keeping themselves safe
- Having systems in place for any students to raise concerns with staff, knowing that they will be listened to, believed and valued; and
- Delivering targeted work on assertiveness and keeping safe for those students identified as being potentially vulnerable

Allegations against students of peer-on-peer abuse will be reported in accordance with the procedures set out in this policy if the relevant threshold criteria have been met (i.e., where there is reasonable cause to suspect a student is suffering or is likely to suffer significant harm).

A student against whom an allegation of abuse has been made may be suspended during the subsequent investigation and the college's policies on behaviour and discipline will apply. The college will seek the advice of children's social care on the investigation of any allegation and will take all appropriate action on the safety and welfare of all students concerned including that of the student accused of abuse.

If it proves necessary that a student(s) needs to be interviewed by the police with regard to allegations of abuse, the college will ensure that, depending on the advice of children's social care, the parents/guardians are informed as soon as possible and that an appropriate adult supports the student during the interview. In the case of students whose parents are abroad, the student's education guardian will be asked to support the student and to accommodate him or her if it is necessary to suspend him or her during the investigation.

Where peer-on-peer abuse occurs both the victim and the perpetrator will be treated as being at risk and safeguarding procedures in accordance with this policy will be followed. The DSL as part of these procedures will produce a welfare risk assessment which will consider the needs of all those involved (victim, perpetrator and other students at the college) and the measures that need to be taken to protect and keep them safe. When compiling the risk assessment appropriate weight will be given to:

- the wishes of the victim
- the nature of the alleged incident
- the ages of those involved
- whether the incident was an isolated one or part of a pattern any power imbalance between the victim and perpetrator
- any ongoing risks to the victim and other students
- and any relevant contextual factors

Children's social services will independently risk assess the situation and any report produced by them will be used to inform and update the college's own risk assessment which, in any event, will be reviewed on a regular basis.

Appendix C

Guidelines for Responding to a Suspicion or Allegation of child Abuse

- All KI Pathways staff must seek to actively safeguard and promote the welfare of minors and be alert to the possibility that some minors may have suffered or be at risk of suffering significant harm, including forms of child abuse. All complaints/allegations of significant harm to minors must be taken seriously and dealt with in accordance with the following procedure.
- If a staff member has a suspicion that a child is suffering or is likely to suffer significant harm, no matter what the cause, he/she should seek the advice and assistance of the DSL, setting out the basis of the suspicion as clearly as possible. This should be done immediately without awaiting confirmation of concerns.
- If a staff member receives from a child an allegation that that child or another child is being abused, has been abused, or is at risk of abuse he/she should:
 - a) Listen carefully and stay calm.
 - b) Ensure that he/she does not 'quiz' the child. However, if necessary, he/she may seek to clarify, using open questions and without putting words into the child's mouth but only to the extent that they understand what the child is telling them
 - c) Reassure the child that by telling him/her they have done the right thing.
 - d) Inform the child that he/she must pass the information on, but that only those that need to know about it will be told.
 - e) Inform the child to whom he/she will report the matter.
 - f) Make a detailed note of the date, time, place, what the child said and did, and the questions asked of the child etc.
 - g) Inform the DSL as soon as possible.
- Staff members should not investigate concerns or allegations themselves but should report them immediately to the DSL in the College.
- Any concern must be reported to the DSL, College Director and DSL who will decide the next appropriate course of action and any required liaison with external bodies if necessary.

Appendix D

Guidelines for staff working with Minors

KI Pathways members should actively seek to safeguard and promote the welfare of minors in their care or for whom they have a responsibility.

To assist in carrying out this duty, KI Pathways should:

- Demonstrate respect of their dignity, privacy and right to be protected from harm
- Maintain age and culturally appropriate relationships with children
- Work with minors in a fair, open and honest way
- Respond positively to concerns raised by minors without rushing to judgement and always taking advice from those identified in this policy, as appropriate
- Always work in an open environment with children
- Avoiding unaccompanied journeys with a child

Staff members are reminded that it is a criminal offence for an adult to engage in sexual activity with a person under the age of 18 when that adult is in a position of trust in relation to that person.

In appropriate cases and in accordance with the law, KI Pathways reserves the right to report to the appropriate authorities any concerns it has that a staff members ought to be included in any list of people who should be restricted from working with children.

Appendix E

Guidelines on allegations made Against Staff, Volunteers, or Another Student

Organisations that work or come into contact with students and young people need to be aware of the possibility that allegations of abuse will be made against members of their staff or another student. This can be an extremely difficult issue to deal with. It can be difficult to accept that a colleague may harm a child/ young person. It may also be that the behaviour that causes concern is bad practice rather than abuse. Allegations will usually be that some kind of abuse has taken place. They can be made by students, and they can be made by other concerned adults. Allegations can be made for a variety of reasons. Some of the most common are:

- Abuse has taken place
- Something happens to a student that reminds them of an event that happened in the past, the student is unable to recognize that the situation and the people are different
- Students can misinterpret your language or your actions because they are reminded of something else
- Some students know how powerful an allegation can be; if they are angry with you about something, they can make an allegation as a way of hitting out
- An allegation can be a way of seeking attention.
- All allegations should be brought to the notice of the designated child protection officer immediately. In cases where the allegation is made against this person, the complainant should approach a more senior official or take the following action him or herself:
 - Make sure that the student in question is safe and away from the alleged abuser
 - Contact the DSL
 - Irrespective of any investigation by social workers or the police, you should follow the appropriate disciplinary procedure; common practice is for the alleged abuser to be suspended from work until the outcome of any investigation is clear
 - Consider whether the person has access to students anywhere else and whether those organisations or groups need to be informed
 - Act upon the decisions made in any strategy meeting.

Irrespective of the outcome of any external investigation, KI Pathways may wish to investigate the matter internally reviewing organisational practice and putting in place any additional measures to prevent a similar thing happening again. KI Pathways may consider suspension and/or disciplinary action in accordance with its published disciplinary procedure.

Well-functioning organisations encourage an environment where people feel safe to express their concerns about the practice of others. The term 'whistleblowing' is often used pejoratively; if a staff member, volunteer or visitor has concerns, they should not be victimised in any way for expressing them.

Appendix F

Guidelines on Safe Recruitment

- All prospective workers (paid and unpaid) should complete an application form which asks for details of their previous employment and for the names of two referees.
- All prospective workers (paid and unpaid) should have an enhanced Disclosure and Barring Service (DBS) disclosure before they start employment with you anyone who refuses to do so should not be employed.
- All prospective workers (paid and unpaid) should be interviewed to establish previous experience of working in an environment where there is contact with students and perceptions of acceptable behaviour.
- Nobody should start work before references have been received. Referees should be reminded that references should not misrepresent the candidate or omit to say things that might be relevant to their employment.
- All appointments to work with students should be subject to an agreed probationary period
- New members of staff should be clear about their responsibilities and wherever possible, work to an agreed job description.
- Recruiting staff should follow the DBS/PVG guidance.
- These guidelines should be available to everyone and fully discussed as part of an induction process.

A single record of all checks made during recruitment need to be kept in one place; usually this is on Workday.

It should record that the following have been done or are N/A

- Identity – name, address, date of birth, evidence of check made and date
- Start date
- Role in organisation
- Qualifications – required, evidence of check made and date
- DBS certificate – Disclosure number, evidence of check and date
- Enhanced DBS – evidence of check and date
- Overseas Police check – check required (Y/N), evidence of check and date
- Right to work in UK – evidence of check and date
- Prohibited list check - evidence of check and date
- Disqualification by association – evidence of check

Appendix G

Guidelines for Colleges where there will be regular use of College building by Partner University

The policy confers responsibilities on all staff, students, agency staff and volunteers, contractors, visitors, consultants and those working under self-employed arrangements who in the course of their duties:

- Engage in regulated activity relating to minors and regulated activity relating to adults (or who supervises anyone engaged in such regulated activity)
- May have contact with vulnerable groups

As per requirements in the KI Pathways safeguarding policy, all staff who have substantial contact with minors and vulnerable students will be checked for relevant criminal convictions and an enhanced disclosure will normally be required. All sub-contractors to include maintenance and cleaning staff, security teams, university staff, university accommodation teams will need to provide confirmation that they have completed the DBS checks and where there is significant contact an enhanced DBS check. Staff at Colleges must ensure that these checks have been conducted and obtain confirmation of this by the relevant company/ Partner University.

There may be instances where staff may not be DBS checked by the partner university, the following safety measures will need to be put in place to mitigate any potential risk:

1. The number of Sub-contractor and or Partner University staff using the College building must be kept to small number of regular users and College staff must be aware of who is entering their building.
2. Partner University staff to be instructed that the College building should only be used for timetabled student contact time and that other work should be done elsewhere.
3. The College to confirm with their Partner University that they are required to make their staff aware that the building is used by a higher number of U18s than would be expected in a standard university building.
4. Partner University to provide their staff a copy of the Partner University Safeguarding Policy and refer all matters raised to the College Safeguarding Lead to investigate.
5. Partner University to inform their staff that any College student who approaches them for assistance should contact the College Safeguarding officer and notify them of this concern.
6. Partner University students with classes in the College building will be contacted by Partner University and reminded that they must carry their student ID card at all times. They must also be prepared to produce it if asked to do so by College Staff.

Appendix H

Guidelines on Safeguarding Procedures for Under 18's

KI Pathways is committed to safeguarding the welfare of young people under 18 and vulnerable adults who book a programme with our colleges

All College staff ensure that reasonable steps to promote and safeguard the welfare of young people and vulnerable adults are taken in conjunction with the College Director, Head of College Services, DSL and other designated staff who are the Under 18's point of contact.

Prior to arrival our admission and sales teams ensure we receive the following completed documents for all under-18 students:

- Underage Consent form confirming guardian and accommodation details
- Maturity assessment for Under 17's

All underage students are required to provide their flight arrival information in advance of their departure to the UK. Students will be invited to use an airport transfer service. The service will be either be a coach transfer or private taxi transfer.

Students travelling independently are required to be met in the arrival hall of the airport by a member of college staff, other person designated by the college or a person assigned by the parents/legal guardian.

Students may arrange their own airport transfer but must confirm in advance to the college, a named "appropriate adult" with whom they will travel to the UK. The appropriate adult may be a family member, guardian or person assigned by the parents/legal guardian to accompany the underage student from the airport to their accommodation in the UK. Students travelling without an appropriate adult are required to use the College Transfer Service and they should not transfer independently.

For students using the transfer service over the arrivals period, the welcome team will ensure students safely board the coach or taxi and are transported to their accommodation or drop off point. The college will make suitable arrangements for underage students to be met at the drop off point and assisted with check in at their accommodation.

Welcome team staff will monitor flight delays and will ensure that all expected students are met. Suitable arrangements will be made any delayed students.

Pre-departure, all students will be provided with a mobile number (arrivals phone) to contact if they have any issues, delays or become lost. The phone will be operated 24 hours a day over the duration of enrolment at the college.

All students under the age of 18 years will need to take College organised accommodation or live with a family member in the UK. If the student does not book accommodation with Kaplan, then the parent/ legal guardian be asked to complete the underage consent form of details

where the student will be living and who they will be living with this should be a responsible adult and not a flat share

On arrival at the college, students will be assigned a main point of contact with the College Services team for assistance and pastoral support until the student's 18th birthday.

All students are required to provide the following information valid address in their country, valid phone number in their country, email address, UK mobile phone number, UK address and next of kin contact details in case of emergency.

Any under 18s student who has to withdraw from the college before the end of their programme or leave the UK for any other personal reason must have the written consent of their parents

Appendix I

Checklist for Whistleblowing

What to do if you wish to raise a concern:

Please do:	Please do not:
Raise the matter as soon as possible if you feel your concerns are warranted	Do nothing. The College would prefer you to raise your concerns so that we can carry out a full and fair investigation
Report your concerns or suspicions to whoever has the appropriate authority to deal with them	Be afraid of raising your concerns. The college has safeguards in place to protect staff that raise a concern
Be assured that the College will take seriously concerns raised based on honest and reasonable suspicions	Try to investigate the matter yourself. This may complicate any later enquiries, particularly if a criminal investigation becomes necessary
Familiarise yourself with the whistle blowing procedure	Approach or accuse any individuals directly
Consider writing down the key points and details as to why you are concerned	Tell your suspicions or concerns to anyone other than those with the proper authority

What to do if you receive a concern:

Please do:	Please do not:
Be fully responsive to staff concerns and seek appropriate guidance	Ignore the concerns raised
Respect principles of confidentiality when dealing with staff	Approach or accuse any individuals directly
Take detailed notes of the information including all details in relation to the matter of concern	Tell your suspicions or concerns to anyone other than those with the proper authority
Evaluate the allegation objectively	Try and investigate the matter yourself
Report this to Director of Operations who will in turn inform the Head Office SMT, HR and legal team	Do nothing- staff should feel able to communicate their concerns freely and in confidence
Deal with the matter promptly and as a matter of priority Delay	Delay the speed of response

Appendix J

Guidelines for Online Learning and Digital Pathways

There has been a sharp increase in the use of technology for remote learning since March 2020.

When selecting a platform for online / virtual teaching, settings should satisfy themselves that the provider has an appropriate level of security. Wherever possible, staff should use College devices and contact students only via email addresses provided by the College. This ensures that the setting's filtering and monitoring software is enabled.

Staff engaging in online learning and activities should display the same standards of dress and conduct that they would in a face-to-face classroom they should also role model this to students and parents. The following points should be considered: -

- the background should be blurred or neutral
- resources / videos must be age appropriate – the child may not have support immediately to hand at home if they feel distressed or anxious about content
- If a teacher has any concerns during an online lesson, they should discuss with their line manager and DSL

It is the responsibility of the staff member to act as a moderator; raise any issues of suitability (of dress, setting, behaviour) with the child and / or parent immediately and end the online interaction if necessary.

If staff need to contact a student or parent/ guardian by phone and do not have access to a work phone, they should discuss this with a senior member of staff and, if there is no alternative, always use 'caller withheld' to ensure the student/ parent or guardian is not able to identify the staff member's personal contact details.