Safeguarding, Child Protection and Prevent Policy

Responsible for review	**Chris Pape**
Version	**8**
Reviewed	**September 2026 (by Claire Oliff, HoTC)**
Next review date	**September 2027**

Amendments Log

Revision	Date	Comments	Review Due
0	15th September 2023	Initial issue	15th September 2024
1	23rd February 2024	Deputy DSL update	15th September 2024
2	5th September 2024	KCSIE and reporting procedures update	5th September 2024
3	14th October 2024	Governor approved version	5th September 2024
4	14th October 2024	Deputy DSL update	5th September 2025
5	29th September 2025	KCSIE update	5th September 2026
6	21st October 2025	Governor approved version	5th September 2026
7	19th January 2026	Improvements made to online safety, filtering and monitoring procedures	5th September 2026
8	1st September 2026	KCSIE Update	1st September 2027

PART A: Organisation arrangements

1.0 Policy Statement

KLM UK Engineering are passionate about safeguarding our students. We recognise the contribution all staff working on behalf of the company can make to protect children and vulnerable adults from harm and promote their welfare. We are committed to providing a caring environment for all our students so that they can participate in all learning and social activities safely. We recognise that good safeguarding requires a continuing commitment from governing bodies, proprietors, and all staff to ensure the safety and welfare of children is embedded in all our processes and procedures. We aim to create the right culture and environment so that staff feel comfortable to discuss matters both within, and where it is appropriate, outside of the workplace (including online), which may have implications for the safeguarding of children.

Our duty under Prevent to protect apprentices from radicalisation is included in this policy.

2.0 Application and Definitions

This policy is relevant to all staff, visitors, contractors, volunteers, service providers, governors and subcontractors who may be working with children and vulnerable adults who are students at the Technical College. Responsibilities for different groups are signposted throughout. Definitions of student groups are:

- 'Children' includes everyone under the age of 18

- A ‘vulnerable adult’ is defined as a person aged 18 or over who has needs for care and support and is experiencing, or at risk of, abuse or neglect and as a result of those needs is unable to protect themselves
- ‘Students’ encompasses both above terms in relation to this policy

We will also follow the guidelines stated in the ‘Care and support statutory guidance’.

3.0 Policy Purpose and Aims

The purpose of the Safeguarding Policy is to ensure that every student at our college is safe and protected from harm. This is in line with the definition of safeguarding set out in Keeping Children Safe in Education 2026, which defines it as:

- Providing help and support to meet the needs of children as soon as problems emerge protecting children from maltreatment, whether that is within or outside the home, including online
- Preventing the impairment of children’s mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes

The college will work with Family Help, Early Help and safeguarding partners where additional multi-agency intervention is required.
We will also follow the guidelines stated in the ‘Care and support statutory guidance’ to work to reduce the risks of abuse or neglect for vulnerable adults, and to stop them where they are occurring.

The aims of this policy are to:

- Define organisational and individual roles and responsibilities for safeguarding
- Outline our legal responsibilities in relation to safeguarding
- Outline the process for managing safeguarding referrals
- Ensure relevant and effective safeguarding practices are in place

4.0 Legislation and Linked Policies

The safeguarding policy works to ensure that all children and vulnerable adults are safe and protected from harm, in line with the definition of safeguarding set out in ‘Keeping Children Safe in Education (KCSIE) 2026’. It is also based on the following legislation:

- Working Together to Safeguard Children 2018
- The Human Rights Act 2010
- Equality Act 2010
- Public Sector Equality Duty
- Counterterrorism and Security Act 2015
- The Prevent Duty Guidance: for further education institutions in England and Wales 2016
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006
- Multi-agency statutory guidance on female genital mutilation April 2016
- The Counter Terrorism and Security Act 2015
- The Children Act 1989, 2004
- The Rehabilitation of Offenders Act 1974
- The Data Protection Act 2018 and UK GDPR
- DFE Data Protection in Schools

It also links to the following Technical College policies and documents:

- Additional Learning Support and Inclusion Policy
- Attendance and Lateness Policy

- Behaviour and Attitudes Policy
- Complaints Policy
- ED&I Policy
- GDPR Policy
- Health and Safety Policy
- IT, Communications and Online Safety Policy
- Lockdown Procedure
- Prevent Risk Assessment
- Recruitment and Selection Policy
- Safeguarding Risk Assessment
- Staff Code of Conduct
- Whistleblowing Policy
- Assessment, Progress and Intervention Policy
- Remote Delivery Policy
- Staff Training and Development Policy
- Artificial Intelligence Policy

5.0 Equality Statement

Some students are at an increased risk of abuse, and additional barriers can exist for them with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise diverse circumstances. We ensure that all students have the same protection, regardless of any barriers they may face.

Staff should be particularly alert to the potential need for early help for a student who:

- Is disabled, has health conditions and/or has specific additional needs
- Has a mental health need
- Is a young carer
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- 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 missing from education due to unexplained and/or persistent absence
- 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 them, 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 or Forced Marriage
- Is privately fostered
- Is an adult apprentice who may be at risk of abuse, neglect, exploitation or coercion within employment, domestic or community settings
- Is pregnant and/or a parent themselves
- Exhibits early signs of abusive, violent and/or harmful behaviours.

6.0 Roles and Responsibilities

6.1 College Staff

All college staff, including those who do not work directly with learners, will read and understand Part One of Keeping Children Safe in Education and sign a declaration annually confirming they have done so.

All college staff undertake annual Safeguarding and Prevent training in line with KCSIE updates.

All college staff will be aware of:

- The systems that support safeguarding, including this policy, the Staff Code of Conduct, the Behaviour and Attitudes policy, the role and identity of the Designated Safeguarding Lead (DSL) and deputies
- The system that is in place to raise concerns, allowing early help to be put in place
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected or exploited, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality
- The signs of different types of abuse, neglect or exploitation as well as specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM and radicalisation
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- The need to report low level concerns or possible breaches of the staff code of conduct recognising these can be based on suspicion, complaint or disclosure or as part of the vetting process. They will also know how to self-refer if they feel they have breached the policy and/ or compromised the welfare of children.
- All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and other risks online as well as face to face. In many cases abuse and other risks will take place concurrently both online and offline. Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography to those who do not want to receive such content.

6.2 The Safeguarding Team

The Role of the Designated Safeguarding Lead

The Designated Safeguarding Lead has a key duty to take lead responsibility for raising awareness across all employees relating to the welfare of children and young people in the company and of overseeing the referral of cases of suspected abuse or allegations.

The Designated Safeguarding and Prevent Lead is **Chris Pape**. His contact details are:

Apprenticeship Delivery Manager and Designated Safeguarding Officer and Prevent Lead
E: Chris.Pape@klmuk.com

Our Deputy DSLs are **Nigel Fromage, Coral Violet and Claire Oliff.** Their contact details are:

Nigel.Fromage@klmuk.com
Coral.Violet@klmuk.com
Claire.oliff@klmuk.com

The DSL will be given time, funding, training, resources and support to complete their duties. There will be DSL cover at all times. In addition, a confidential shared inbox is available to students: safeguarding@klmuk.com

The responsibilities of the DSL (and Deputy DSLs) include:

- Review all referrals and assess the level of risk, deciding next steps. Recording referrals in the Safeguarding and Wellbeing logs
- Referring cases to relevant external agencies and supporting other staff to do so as required
- Being alert to students who are at risk and implement early help strategies as required
- Ensuring that this policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly (including by the Governing body)
- Ensuring that this policy is available publicly and parents/carers are aware of the fact that referrals about

suspected abuse, neglect and exploitation may be made
- Ensuring safeguarding and wellbeing concerns are recorded using the Safeguarding and Wellbeing Form
- Ensuring cases of suspected abuse or allegations are appropriately referred to relevant agencies, supporting staff as necessary
- Providing advice, support and training to staff, consultants and trainers across the company on issues relating to safeguarding and Prevent, supporting them to make referrals as required
- Ensuring all records of any safeguarding and Prevent referrals, complaint or concern are kept securely (even where that concern does not lead to a referral)
- Ensuring safeguarding records will be retained in accordance with statutory guidance and organisational retention schedules and will be transferred securely where required
- Ensuring all staff, consultants, trainers and students have access to the Safeguarding and Prevent Policy
- Tracking of all annual safeguarding and Prevent training for college and base staff
- Ensuring governors are current and aware of responsibilities to ensure critical challenge with regard to safeguarding and Prevent
- Ensuring safer recruitment practices are in place for recruitment of college staff
- Ensuring identification badges are issued to staff, visitors, contractors, volunteers, service providers, Governors and subcontractors
- Ensuring that all staff undertake appropriate safeguarding and child protection training that is relevant to their contact with our students, and updating the content of the training regularly

The DSL (and Deputy DSLs) have completed training to provide them with the knowledge and skills required to carry out the role. Refresher training will be completed at least every two years. The DSL and Deputy DSLs have also completed Prevent awareness training.

The Head of Technical College selects the DSL and DDSLs. An interview process takes place to appoint the postholders to ensure that they have the relevant skills and experience, as well as qualifications, to undertake the role.

6.2.1 Information sharing

The KLM UK Engineering safeguarding team have a responsibility to share information with employers and partnered institutions where it may affect a student's employment or place on a course.

When deciding what information to share, we will ensure:

- Information is relevant to what the receiving setting needs to know and that the information is clearly presented and suitably contextualised
- That we use professional judgement to make sure that any information shared is focused and proportionate
- Where a student is changing settings or moving into the workplace and information indicates a risk to others and/or the individual student, the receiving institution is responsible for assessing risk and putting a safety and support plan in place. The DSLs or appropriately nominated staff (employer) from both settings will have a conversation where there are concerns.

6.3 The Role of the Governing Body

The responsibilities of the Governing Body include:

- Undergoing training at induction and throughout their tenure to ensure they are appropriately informed to support and challenge the college in all areas of safeguarding and Prevent
- Facilitating a whole-college approach to safeguarding, ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development

- Evaluating and approving this policy at each review, ensuring it complies with the law, and hold the Head of Technical College to account for its implementation
- Appoint a link governor to monitor the effectiveness of this policy

6.3.1 Explicit Role of the Safeguarding Governor

The Governor responsible for safeguarding will:

- Hold a relevant safeguarding qualification (e.g., Level 3 or above) and complete annual refresher training aligned with KCSIE updates
- Maintain current knowledge of statutory guidance, including KCSIE 2026 and Working Together 2025, ensuring that practices remain compliant and reflect national expectations
- Act as a critical friend to the DSL and DDSLs, providing challenge, oversight and support on safeguarding practice and policy implementation
- Meet regularly with the DSL and DDSLs to review case management trends, training compliance, Prevent referrals and lessons learned
- Review safeguarding records (appropriately anonymised) and ensure that the Governing Body receives regular anonymised reports on safeguarding activity, case numbers, and emerging risks.
- The Safeguarding Governor will report findings to the Governing Body and ensure safeguarding remains a standing agenda item at Board level.

6.4 The Role of the Head of Technical College

The Head of Technical College is responsible for the implementation of this policy, including:

- Ensuring that staff, consultants, instructors and students are informed of the college systems which support safeguarding and that they understand and follow the procedures included in this policy that are pertinent to them
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Acting as the 'case manager' in the event of an allegation of abuse made against a member of college staff, where appropriate
- Ensuring that the policies and procedures adopted by the Governing Board, particularly concerning referrals of cases of suspected abuse, neglect or exploitation, are followed by all staff
- Creating a transparent culture of vigilance and safety so that staff and students feel safe in the college and empowered to report any concerns
- Reviewing policies and college systems to ensure safeguarding is at the forefront of decision making
- The Managing Director will act as the 'case manager' if an allegation of abuse is made against the Head of Technical College, where appropriate.

6.5 Students

It is important that students understand their role in communicating concerns about their peer or members of staff. Their responsibilities are:

- To attend and complete all safeguarding and prevent training
- Use the reporting procedures available to them.

6.6 Employers

Employers play a vital role in safeguarding apprentices. Where apprentices are employed or attend employer premises, KLM UK Engineering will work in partnership with employers to promote learner welfare.
Employers are expected to:

- Provide a safe working environment
- Raise safeguarding concerns relating to apprentices promptly
- Support attendance at safeguarding training where required
- Ensure apprentices understand how to report safeguarding concerns
- Support any safeguarding plans implemented by the Technical College
- Report concerns involving exploitation, harassment, discrimination, radicalisation or inappropriate workplace behaviour

The Technical College retains overall responsibility for safeguarding concerns identified through apprenticeship delivery and will work collaboratively with employers and appropriate agencies.

7.0 Reporting Procedures

The Technical College will carry out our responsibilities in line child protection procedures and in accordance with Norfolk Guidance to Understanding Continuum of Needs | NSCP | PWWC

It is essential to act quickly and professionally in all cases of suspected abuse. All staff must know what to do if a student chooses to talk to them about any matter which raises safeguarding or child protection concerns. Staff should know how to take the required course of action to maintain an appropriate level of confidentiality.

All staff, volunteers and Governing Body members must follow the procedures set out below in the event of a safeguarding issue.

7.1 If you have concerns about a child or believe a child is at risk of harm, neglect, exploitation, radicalisation or abuse (please see Part B for further guidance on recognising these)

- Fill in the Safeguarding and Wellbeing Form (Annexe 1), to gather key information
- This is also available electronically through the intranet in the Apprentice Zone, via the QR code on the Safeguarding visitors card (available from the Technical College reception), or as paper copies from HR
- Report any safeguarding concern to the DSL immediately, or to a Deputy DSL if the DSL is unavailable, as soon as you become aware of it. Do not wait to complete the Safeguarding and Wellbeing Form before reporting the concern or taking necessary protective action.
- Complete and submit the electronic form, or hand the paper form to the DSL or a Deputy DSL, as soon as possible and no later than 24 hours after becoming aware of the concern. This is the college's maximum deadline for the written record, not a waiting period for reporting or action. If a child is suffering or likely to suffer harm, take immediate safeguarding action; if a child is in immediate danger, call 999.
- If, in exceptional circumstances, the DSL and Deputy DSLs are not available, this should not delay appropriate action being taken. Speak to Wayne Easlea, Managing Director as the Leadership Team contact and tell the DSL as soon as possible that you have done so
- Do not discuss the situation with anyone else other than in the circumstances above
- Once the form is complete, do not further investigate concerns or allegations yourself

7.2 Key things to remember if a student discloses a safeguarding issue to you

- Never promise confidentiality – you will write up the concern and pass it to the Designated Safeguarding Lead (DSL), Chris Pape
- Listen carefully and stay calm – listen without making assumptions or judgements
- Do not interrupt
- Stay calm and do not show that you are shocked or upset
- Any questions that are asked to clarify matters should be framed in an open manner and not lead the student in any way
- Use the questions in section one of the form to gather key information for the DSL
- Reassure them that by telling you, they have done the right thing
- Inform them that you **must** pass the information on to the DSL

- Find out what the student would like to happen
- Write up your conversation as soon as possible in the student's own words using the Logging a Concern Form
- Do not discuss the disclosure with anyone
- If the concern relates to extremism, the DSL will consider the level of risk and decide which agency to make a referral to. This could include Channel, the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team

The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which staff members can call to raise concerns about extremism with respect to a student. Staff can also email counter.extremism@education.gov.uk (this is not for use in emergency situations).

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

- Think someone is in immediate danger
- Think someone may be planning to travel to join an extremist group

7.3 If you discover that Female Genital Mutilation (FGM) has taken place or a student is at risk of FGM

Keeping Children Safe in Education 2026 explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs". FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.
The FGM and other 'honour-based' abuse (HBA) mandatory reporting duty is a legal duty provided for in the FGM Act 2003 (as amended by the Serious Crime Act 2015). The legislation requires regulated health and social care professionals, teachers and instructors in England and Wales to make a report to the police where, in the course of their professional duties, they either:

- Are informed by a girl under 18 that an act of FGM has been carried out on her; or
- Observe physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth

They are required to immediately report this to the police, personally. This is a mandatory statutory duty, and professional will face disciplinary sanctions for failing to meet it. Unless they have been specifically told not to disclose by the police, they should also discuss the case with the DSL and involve children's social care as appropriate. The only exception to this is if you know that another individual from your profession has already made a report; there is no requirement to make a second.
Reports under the duty should be made as soon as possible after a case is discovered, and best practice is for reports to be made by the close of the next working day, unless any of the factors described below are present. You should act with at least the same urgency as is detailed in the safeguarding procedure in 7.1.

The duty for teachers mentioned above does not apply in cases where a student is at risk of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine students.

Any other member of staff who discovers that an act of FGM appears to have been carried out on a student under 18, must speak to the DSL and follow our college safeguarding procedures as detailed above.

7.4 If you have a concern about mental health

Mental health problems can, in some cases, be an indicator that a student has suffered or is at risk of suffering abuse, neglect or exploitation. Staff will be aware of behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

Staff should be alert to self-harm, suicidal ideation and emotionally based distress, recognising that these may

indicate safeguarding concerns requiring immediate assessment by a trained professional (this does not include mental health first aiders). If staff have a mental health concern about a child that is also a safeguarding concern, or that may develop into one, they should take immediate action by following the steps below:

- Fill in the Safeguarding and Wellbeing Form (Annexe 1)
- This is also available electronically through the intranet in the Apprentice Zone, or via the QR code on the Safeguarding visitors card (available from the Technical College reception) or as paper copies from HR
- Report any safeguarding concern to the DSL immediately, or to a Deputy DSL if the DSL is unavailable, as soon as you become aware of it. Do not wait to complete the Safeguarding and Wellbeing Form before reporting the concern or taking necessary protective action.
- Complete and submit the electronic form, or hand the paper form to the DSL or a Deputy DSL, as soon as possible and no later than 24 hours after becoming aware of the concern. This is the college's maximum deadline for the written record, not a waiting period for reporting or action. If a child is suffering or likely to suffer harm, take immediate safeguarding action; if a child is in immediate danger, call 999.
- Do not discuss the situation with anyone else

If staff have a mental health concern that is **not** also a safeguarding concern, they can fill in the form or speak to the DSL for further advice. KLM UK Engineering employ mental health first aiders. The DSL may signpost mental health concerns to them, should they deem it appropriate to do so, or seek support from HR so they can meet with the person involved, refer to occupational health or EAP, or seek other external help on their behalf.

7.5 If you have a concern about the sharing of nudes and semi-nudes (sexting)

If staff are made aware of an incident involving the creation or consensual or non-consensual sharing of nude or semi-nude images/videos (also known as 'sexting' or 'youth produced sexual imagery'), staff must report it to the DSL or Deputy DSLs (in their absence) using the procedure detailed above. This includes material that is digitally altered or wholly generated using artificial intelligence, including deepfakes and 'deep nudes'. The reporting procedure and the restrictions below on viewing, copying, sharing, storing and deleting imagery apply equally to this material. Staff must not delay reporting while attempting to establish whether an image is genuine.

Staff must not:

- View, copy, print, share, store or save the image(s), or ask a student to share or download it (if staff have already viewed the image(s) by accident, they must report this to the DSL)
- Delete the imagery or ask the student to delete it
- Ask the student(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- Share information about the incident with other members of staff, the student(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved

Staff should explain that they will report the incident, do so via the reporting process, and reassure the student(s) that they will receive support and help from the DSL.

7.6 If you have a concern about child-on-child abuse

We recognise that children are capable of abusing other children. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up", as this can lead to a culture of unacceptable behaviours and an unsafe environment for students. All child-on-child abuse is unacceptable and will be taken seriously.

This child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This

might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put students in the college at risk
- Is violent
- Involves students being forced to use or carry drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

If you have a concern about child-on-child abuse that is also a safeguarding concern, take immediate action by following the steps below:

- Fill in the Safeguarding and Wellbeing Form (Annexe 1)
- This is also available electronically through the intranet in the Apprentice Zone, or via the QR code on the Safeguarding visitors card (available from the Technical College reception) or as paper copies from HR
- Report any safeguarding concern to the DSL immediately, or to a Deputy DSL if the DSL is unavailable, as soon as you become aware of it. Do not wait to complete the Safeguarding and Wellbeing Form before reporting the concern or taking necessary protective action.
- Complete and submit the electronic form, or hand the paper form to the DSL or a Deputy DSL, as soon as possible and no later than 24 hours after becoming aware of the concern. This is the college's maximum deadline for the written record, not a waiting period for reporting or action. If a child is suffering or likely to suffer harm, take immediate safeguarding action; if a child is in immediate danger, call 999.
- Do not discuss the situation with anyone else

7.7 If you have a concern about Child Sexual Exploitation (CSE), Child Criminal Exploitation (CCE): County Lines and Serious Violence

At the Technical College, we train staff to recognise that both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity.

If you have a concern about CSE or CCE, take immediate action by following the steps below:

- Fill in the Safeguarding and Wellbeing Form (Annexe 1)
- This is also available electronically through the intranet in the Apprentice Zone, or via the QR code on the Safeguarding visitors card (available from the Technical College reception) or as paper copies from HR
- Report any safeguarding concern to the DSL immediately, or to a Deputy DSL if the DSL is unavailable, as soon as you become aware of it. Do not wait to complete the Safeguarding and Wellbeing Form before reporting the concern or taking necessary protective action.
- Complete and submit the electronic form, or hand the paper form to the DSL or a Deputy DSL, as soon as possible and no later than 24 hours after becoming aware of the concern. This is the college's maximum deadline for the written record, not a waiting period for reporting or action. If a child is suffering or likely to suffer harm, take immediate safeguarding action; if a child is in immediate danger, call 999.
- Do not discuss the situation with anyone else

If a child is suspected to be at risk exploitation or involvement in county lines, a referral to the Children's Advice and Duty Service (CADS) will be made alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

7.8 If you have a concern relating to radicalisation

KLM UK Engineering are committed to keeping students and staff safe by adhering to Prevent guidance. As such, all staff will be trained to recognise signs of potential radicalisation. Potential indicators include:

- Use of inappropriate language
- Possession of violent extremist literature or using symbols associated with an extremist cause
- Behavioural changes
- The expression of extremist views
- Advocating violent actions and means
- Association with known extremists
- Seeking to recruit others to an extremist ideology

The Government has defined extremism as "vocal or active opposition to fundamental British Values", which include:

- Individual liberty
- Rule of law
- Democracy
- Mutual respect and tolerance of different faiths and beliefs.

To ensure that staff and students are safeguarded in this area, we will ensure:

- There are systems in place for keeping students safe from extremist material when accessing the internet in our college by using effective filtering and monitoring policies.
- The DSL has received Prevent training and will act as the point of contact within our college for any concerns relating to radicalisation and extremism.
- The DSL will make referrals in accordance with Norfolk Channel Procedures and will represent our college at Channel meetings as required.
- Through our curriculum, we will promote the spiritual, moral, social and cultural development of students.

For urgent radicalisation concerns, we will contact Norfolk police on 101 or, in an emergency, 999.

For non-urgent concerns, we will take immediate action by contacting the DSL by following our college safeguarding reporting procedures as detailed in 7.1. Refer to section 8.2.3 for Channel referral details.

7.9 If you have a concern about a student who is not an employee of KLM UK Engineering

All apprentices, regardless of employer, will be safeguarded under this policy.

Procedure for students enrolled with other institutions:

- A report should be made using the procedure/to the contact for the institution in which they are enrolled.
- Where the concern is urgent, and no contact can be made with the institution with which the student is enrolled, the DSL for KLM UK Engineering should be contacted immediately in order to advise on next steps.

At the time of writing, students from City College Norwich are taught by the KLMUKE instructor team. The City College safeguarding policy can be found here, with the process to report a concern detailed on page 21: Safeguarding Procedure (ccn.ac.uk)

8.0 Reporting systems and training for our students

The college recognises the importance of ensuring students feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, the college will:

- Put systems in place for students to confidently report their concerns through encouraging them to speak to the DSL or a Deputy DSL, speak to a member of staff or email **safeguarding@klmuk.com**
- Ensure reporting systems are well promoted, easily understood and easily accessible for students
- Make it clear to students that their concerns will be taken seriously, and that they can safely express their views and give feedback

All students will be given training on safeguarding during their induction. This includes:

- How to report a safeguarding concern
- Specific areas of safeguarding to which they may be susceptible, including County Lines, Knife Crime (Knife Angel Initiative), Child on Child Abuse, Gaming and Radicalisation, Sexual Consent and Drink Spiking
- How safeguarding applies to them in the workplace

We recognise that we have a diverse cohort of students of different ages. To safeguard our adult students, they will be given an additional induction stating the dos and don'ts of working with students who are under 18 and will confirm their understanding by signing a training log.

8.0.1 Student Voice

The Technical College regularly gathers student feedback regarding safety, wellbeing, workplace welfare, equality, behaviour and safeguarding arrangements through surveys, Learner Reviews and via Student Rep forums.
Feedback will be reviewed by the safeguarding team to identify emerging themes and risks.

8.1 Out of hours reporting

The Safeguarding Team will check the Safeguarding inbox (safeguarding@klmuk.com) by 09:00 each morning and follow processes outlined in this policy.
The inbox is set up with an auto reply which reiterates the out of hours support outlined in the Emergency Action Protocol, which students are trained on during their induction:

Thank you for contacting the Safeguarding Team.
Our working hours are 8am-4pm Monday to Friday. We will respond to you as a matter of priority on a during working hours or at the start of the next working day if you are contacting us out of hours.
For out of hours support:
Immediate Danger or Medical Emergency:

- *Call 999 immediately for the Police, Fire, or Ambulance service.*
  For non-emergency medical support:
- *Call 111 for medical advice*
- *The NHS Norwich Walk-in Centre is available at 07:00-19:00 Mon-Sat at Rouen House, Rouen Road, Norwich, NR1 1RB. Check the website for the waiting time.*

Mental health support outside of work hours:

- *NHS: Call 111 and select the Mental Health option (24 hours)*
- *The Samaritans: Call 116 123 (24 hours)*

If you have an urgent safeguarding concern outside of work hours:

- *Call 999 in an emergency*
- *Call Norfolk County Council 03448 008020 and select option 1 (24 hours)*

If you have an urgent concern relating to radicalisation outside of work hours:

- *Call 999 in an emergency*
- *Call Norfolk Police Prevent team on 01953 423905 / 01953 423896*
- *Call National Prevent advice line 0800 011 3764*

8.2 If you have a concern about a member of staff

This section of the policy should be referenced where there is a concern that **anyone working in the college or with our students as part of their role within the company has:**

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

8.2.1 Reporting process for concerns about Technical College Staff Only

If Technical College staff have a safeguarding concern or an allegation of harming or posing a risk of harm to children is made about another member of Technical College staff (including supply staff, volunteers, and contractors), then:

- This should be referred to the Head of Technical College, following the process in the Staff Code of Conduct
- Where there is a concern/allegation about the Head of Technical College, this should be referred to the Managing Director
- In a situation where there is a conflict of interest in reporting the matter to the Head of Technical College, this should be reported directly to the **Local Authority Designated Officer(s) LADO(s).**

Read here for more information about the LADO: The role of the LADO (Local Authority Designated Officer) – national-lado-network.co.uk

The Head of Technical College will conduct enquiries in line with company procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below. The Head of Technical College will use the information collected to categorise the type of behaviour and determine whether it meets the harm threshold or if it is a 'low-level concern'. A low-level concern is any concern, no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt', that an adult working in or on behalf of the college may have acted in a way that:

- Is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside of work and does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO
- The Head of Technical College on all such occasions will discuss the content of the allegation with the Chair of Governors, and the Local Authority Designated Officer (LADO) for safeguarding
- If the allegation made to a member of staff concerns the Head of Technical College, the member of staff receiving the information will immediately inform the Managing Director who will consult with the LADO
- We will always follow our locally agreed procedures for the management of allegations against staff. The procedures are available at :https://www.norfolk.gov.uk/children-and-families/keeping-children-safe/local-authority-designated officer
- If an allegation is made against a contractor, we will follow our standard procedures and inform the agency fully. The college will be responsible for taking the lead in informing the LADO.

The DSL will inform the person accused about the allegation as soon as possible after consulting the Head of Technical College, unless a strategy discussion is needed or other agencies need to be involved, in which case

the DSL will wait until these parties have been consulted before informing the accused. This also applies to informing parents or carers of children involved.

The KCSIE 2026 guidance states suspension should not be the default position: an individual should be suspended only if there is no reasonable alternative. As a company, we have a duty of care to employees and will support the accused to manage and minimise the stress resulting from the allegation. The accused will be advised to contact their union representative or a colleague for support and will be given access to welfare counselling or medical advice where available. KLM UK ENGINEERING will consider the findings of the investigation, and suggestions made in KCSIE regarding action to be taken when an allegation is made against a member of staff.

It is important that the company maintains confidentiality about the investigation and adhere to reporting restrictions that prohibit the publication of any material that may lead to the identification of the accused unless they are charged with an offence, have waived their right to anonymity, or information or a decision on the case is published by the secretary of state.

LADO contact details

Norfolk LADO: LADO@norfolk.gov.uk **Tel:** 01603 223473

- In all cases where allegations are made against people who may constitute part of the children's workforce, KLM UK ENGINEERING will consult with the Local Authority Designated Officer (LADO) in retrospect with their area.
- They will offer advice regarding appropriate next steps in relation to referral and investigation and ensure that all cases are handled in accordance with safeguarding procedures.

Allegations of Low-Level concerns

The college will train staff to identify low level concerns that come to their attention. These could arise as a result of an observation, suspicion or disclosure. They will be possible breaches of the college's safeguarding policy or code of conduct and could include but not exclusive to:

- Being over friendly with children
- Having favourites
- Engaging with children on a 1-1 basis in a secluded area or behind closed doors without windows
- Humiliating students

How to report low-level concerns:

- Any low-level concerns should be emailed to the Head of Technical College so that there is a written record
- All low-level concerns will be followed up and usually addressed with the member of staff concerned unless there is a good reason not to
- All low-level concerns that are raised and are found to be substantiated will be followed up in writing and a record will be kept of the concern in the staff member's HR file.

If the matter continues and there are persistent breaches, the issue will be treated as a serious concern.
If a concern is not substantiated a record will be kept but separate from the main personnel file. Low-level concerns will not be cited in references unless they become serious concerns.

8.2.2 Reporting process for concerns about all other staff

Where a staff member has concerns about a member of staff who is not employed by the Technical College, they should inform their line manager, or a member of the leadership team/HR where this is not appropriate, of their concern.

The circumstances will be investigated fully under the Company's Disciplinary Procedure. If it is agreed to be a safeguarding matter a written record of the date and time of the report will be made including the name of the person to whom the matter was reported and sent to the Designated Safeguarding Officer within 24 hours. Advice from the Designated Safeguarding Lead may be sought in order to direct the action taken by the company appropriately.

8.2.3 Escalating concerns to external agencies

Escalating safeguarding concerns to Children's Services

DSLs will contact Children's Advice and Duty Service (CADS) if a child is at risk of exploitation. Following guidance from CADS, we will get permission from parents to make this call if this does not place the child, someone else or the referring member of staff at increased risk of suffering harm or if it might undermine the investigation of a serious crime.

Children's Advice and Duty Service 0344 800 821 8021 Monday – Friday 9am-5pm
Out of hours emergency duty team 0344 800 8020

Escalating concerns relating to Prevent

DSLs will contact the Norfolk County council Channel team when there is a non-urgent concern.

Norfolk County Council Channel Contact**Tel**: 01953 423905 or 01953 423896
Website: Preventing radicalisation - Norfolk County Council
Email: ChannelPanel@norfolk.gov.uk / preventreferrals@norfolk.pnn.police.uk.

Norfolk County Council Prevent Coordinator: Russ Cole russell.cole2@norfolk.gov.uk

9.0 Training and checks for staff members (including temporary staff), visitors, volunteers and Governors

This section of the policy sets out the specific training requirements and checks required for members of staff working with children and vulnerable adults as part of the apprenticeship delivery programme.

The Technical College will determine whether an individual is engaged in regulated activity in accordance with current legislation, Keeping Children Safe in Education and Disclosure and Barring Service guidance. Decisions regarding safeguarding vetting requirements will be based upon the duties undertaken and the nature of contact with students.

See Regulated activity in relation to children for further definitions: scope Department for Education (publishing.service.gov.uk)

9.1 Technical College staff

All Technical College staff have an enhanced DBS check, as well as the checks detailed in Part Three of Keeping Children Safe in Education which are delivered through the HR process.

All staff, including Technical College staff in the administration team who do not work directly with students, will read and understand Part One of Keeping Children Safe in Education and confirm this as part of induction and annual safeguarding updates.

All Technical College staff members will undertake safeguarding and child protection training at induction to ensure they understand the college's safeguarding systems and their responsibilities, and can identify signs of possible abuse, neglect or exploitation.

This training will be regularly updated and will include:

- Safeguarding and Prevent Policy
- Behaviour Policy
- Staff Code of Conduct
- Role of the DSL (including the identity of the DSL and all Deputy DSLs)
- Prevent

Staff will also receive regular safeguarding and child protection updates, including online safety, as required but at least annually (for example, through emails, e-bulletins and staff meetings). Volunteers and contractors will receive appropriate safeguarding training, if applicable.

9.2 Role changes for existing staff

Where a member of staff moves from a post that was not regulated activity with students into a post that is regulated activity with students, the relevant checks for this change in role will be carried out if they have not already been completed as part of the recruitment process.

9.3 Base Maintenance staff

Base Maintenance staff may have varying levels of contact with apprentices depending on their role. The Technical College will complete a risk-based assessment of such roles and implement any necessary safeguarding training, supervision and vetting requirements in accordance with current statutory guidance.

9.4 Base Maintenance: Mentors

At Base Maintenance, apprentices will be assigned to members of staff who will act as mentors. All mentors who are training an apprentice who is under 18, and their duties meet the definition of regulated activity, will hold an enhanced DBS certificate.

Where a student is under 18, and safeguarding concerns exist, the DSL will meet with the mentors and explain the concerns. The students will be made aware of this meeting and will be invited to participate where relevant.

All mentors will undertake safeguarding training from the DSL or another appropriately trained member of staff.

To safeguard both staff and adult students, where the student is a vulnerable adult, the DSL will assess the situation before deciding whether permission from the student should be sought before sharing safeguarding concerns.

9.4.1 Safeguarding in the workplace

Many safeguarding concerns involving apprentices arise within employment settings rather than educational settings. Concerns may include bullying, harassment, discrimination, unsafe working practices, exploitation, inappropriate relationships, mental health concerns, substance misuse or radicalisation.

Apprentices may report concerns to:

- The DSL or Deputy DSLs
- Human Resources
- Their workplace line manager
- safeguarding@klmuk.com

All concerns will be reported and assessed under this policy regardless of whether the incident occurred on employer premises or at the Technical College.

9.5 Temporary staff

- All staff employed in the college on a fixed-term contract or on a casual basis to fill a temporary vacancy will be employed via a reputable agency
- The college will acquire the agency's safeguarding policy and procedure documents
- All temporary staff will be vetted by the agency and vetting details will be sent to the college prior to the start of employment. Vetting details will be saved by the college for up to a year after employment
- All temporary staff working in the college will be required to provide a DBS number and photo ID on arrival to the college on the day that they start work
- The college will obtain written confirmation that the agency has completed all safer recruitment checks required by Keeping Children Safe in Education.

9.6 Volunteers

- All volunteers/visitors to the college will be issued a lanyard at reception which is colour coded as RED to indicate their safeguarding risk. They will be accompanied at all times whilst on site
- All volunteers in regulated activity will require an enhanced DBS check. All volunteers will work under a risk assessment
- A checklist will be followed prior to the volunteer starting at the college and this will include applications, interviews and reference checking in the same way as other staff
- All volunteers will be presented with a safeguarding policy
- If volunteers are attending college on an ongoing basis, longer than two weeks, they will be required to attend a full safeguarding induction

All the above information will be kept in an accurate Single Central Record (SCR) to demonstrate that we have carried out the mandatory pre-appointment checks outlined above.

9.7 Visitors

All visitors will be required to verify their identity to the satisfaction of staff. If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the college. Visitors should be ready to produce identification and are expected to sign the visitors' book and wear a visitor's badge.

Visitors to the college who are visiting for a professional purpose, such as educational psychologists, will be asked to show photo ID and:

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID
- Or the organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out
- All other visitors to the KLM UK Engineering team, including visiting speakers, will be accompanied by a member of staff at all times.

We will ensure all visitors to the college receive information regarding their own conduct towards students in our college and how to report any concerns that they may have.

9.8 Senior Leadership (Governing bodies/board level)

We understand that as a college we require, in addition to our DSL, a senior board level (or equivalent) to take leadership responsibility for our safeguarding arrangements. The board member for safeguarding is Jason Lloyd. They have appropriate training in order to carry this responsibility. This **must** be a separate person from the DSL, to ensure there is sufficient challenge to our safeguarding arrangements and performance.

In addition, all members of the Technical College Governing Body will undergo a DBS check and will attend safeguarding training at appropriate intervals to ensure they are able to execute their safeguarding duties. They will ensure our safeguarding policy and our staff code of conduct is in place and remains effective and is robust. Our Head of Technical College will ensure all policies and procedures are followed by all staff, particularly

concerning referrals of cases of suspected abuse and neglect and exploitation.

9.9 Referrals

We will always refer to the Disclosure and Barring Service any member of staff who is dismissed because of misconduct relating to a child. This includes incidents where:

- An individual has harmed, or poses a risk of harm, to a child or vulnerable adult
- The harm test is satisfied in respect of that individual
- The individual has received a caution or conviction for a relevant offence, or if the reason to believe that individual has committed a listed relevant offence; and that individual has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left

The DBS will then consider whether to bar the person. Referrals will be made as soon as possible after the resignation or removal of the individual.

10.0 Recruitment and Selection

KLM UK Engineering aims to recruit and develop skilled and motivated staff who will deliver an outstanding service to the local community. An effective recruitment and selection process is a major contributor to this aim. KLM UK Engineering are committed to safeguarding and promoting the welfare of children and adults at risk of harm and expects its staff to share this commitment.

- KLM UK Engineering will apply principals of Safer Recruitment to staff working with children, young adults and vulnerable adults as part of their apprenticeships. It will be the employer/workplace's responsibility to ensure that their staff and volunteers have the relevant DBS disclosures as detailed in the training and checks section of this policy. Copies of certificates are held by HR.
- All members of college staff working in settings with children, young adults or vulnerable adults must have completed Prevent and safeguarding in the last year. This will be checked as part of occupational competency.
- In addition to the staff records which are kept as part of normal business, KLM UK Engineering will keep and maintain a single central record of recruitment and vetting checks.

See 'Safer Recruitment and Selection Policy' for more detail.

11.0 Contextual Safeguarding: Mandatory testing

Please refer to the KLM UK Engineering Workplace Drug and Alcohol Testing Procedure for details of this process.

PART B: Definitions and further contextual safeguarding

12.0 Types of abuse, neglect and exploitation

The section below gives further detail about specific types of abuse, neglect and exploitation, including definitions, signs to be aware of and specific action to be taken if different to the standard reporting procedure.

All staff should be aware that abuse, neglect, exploitation, child protection 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. If staff are unsure, they should always speak to the Designated Safeguarding Lead (or deputy).

Abuse: a form of maltreatment of a child. Somebody may abuse, neglect or exploit a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting

by those known to them or, more rarely, by others. Abuse and exploitation can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused or exploited by an adult or adults or another child or children.

Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include 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 cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether 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.

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. (Appendix A of WTTSC 2023)

Domestic Abuse: Domestic abuse can [be] psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.
"Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others." This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others.

Exploitation: Exploitation can include instances where a child or young person may be groomed to become involved in sexual or criminal activity. There is a significant distinction as sometimes they may have been viewed as an offender instead of a victim. It is important to take a safeguarding first approach. All staff will report any concerns to the Designated Safeguarding Lead via the college's published procedures.

Extra-Familial Harm: Recognise that harm can occur outside the home in peer groups, online spaces, workplaces or the wider community. Assessments and safety planning should include these contexts.

13.0 Contextual Safeguarding

All staff, but especially the Designated Safeguarding Lead (and deputies) should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the college and/or can occur between children outside of these environments. All staff, but especially the Designated Safeguarding Lead (and deputies) should consider whether children are 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, and serious youth violence.

13.1 Child abduction and community safety incidents

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers. Other community safety incidents in the vicinity of a college can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation. As a college, we will provide practical advice on how students can keep themselves safe through mentoring, lesson delivery and working with the police force and other agencies.

13.2 Children and the court system

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age-appropriate guides to support children (5-11 year olds and 12-17 year olds). They explain each step of the process and outline the support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making child arrangements via the family courts following separation can be stressful for children and entrench conflict in families. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers. The DSL and Deputy DSLs will work with all relevant agencies to ensure our students receive appropriate support through the court process and access to the above resources.

13.3. Children who are frequently absent from college

Children and vulnerable adults who are absent from college can be a sign of a safeguarding concern, including sexual abuse, sexual exploitation or criminal exploitation.

The college recognises that apprenticeship learners may become missing from education even where they remain employed. Repeated non-attendance at off-the-job training, loss of contact with the provider, withdrawal from reviews, unexplained workplace absence or disengagement from learning may indicate safeguarding concerns.

In such circumstances the DSL will consider whether additional safeguarding intervention is required and whether referral to external agencies is appropriate.

13.4 Children with a social worker

Children may need a social worker due to safeguarding and welfare concerns. The DSL and all members of staff will work with and support social workers to help protect these vulnerable children. A list of the children with a social worker will be kept and reviewed annually and shared with relevant staff in the college to ensure that they are contacted when required.

13.5 Children with family members in prison

Approximately 200,000 children have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children. DSL and Deputy DSLs will work with all relevant agencies to ensure our students receive

appropriate support throughout this process.

13.6 Students who are LGBT+ or questioning their gender identity

A student being lesbian, gay, or bisexual is not in itself an inherent risk factor for harm, however, they can sometimes be targeted by other students. In some cases, a student who is perceived by other students to be lesbian, gay, or bisexual (whether they are or not) can be just as vulnerable as students who are.

Where a student is questioning their gender, the college acknowledges that there remain many unknowns about the impact of social transition and students may have wider vulnerabilities including having complex mental health and psychosocial needs, and in some cases additional diagnoses of autism and/or attention deficit hyperactivity disorder.

In line with advice in KCSIE 2026, the college will take a cautious approach and consider the broad range of a student's individual needs. The college will always work in partnership with the student's parents where the student is under 18. Any decisions that are made will be in line with KCSIE 2026 and logged in the Safeguarding and Welfare tracker.

13.7 Child Sexual Exploitation (CSE)

Child sexual exploitation is a form of sexual abuse where children are sexually exploited for money, power or status. Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation. Where this is the case, the college recognises that the child perpetrator may also be a victim. It can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Child sexual exploitation does not always involve physical contact and can happen online. A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point. CSE can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex. Staff are made aware that the following signs may be indicators of sexual exploitation and should discuss any concerns they have with the DSL:

- Children who appear with unexplained gifts or new possessions
- Children who associate with other young people involved in exploitation
- Children who have older boyfriends or girlfriends
- Children who suffer from sexually transmitted infections or become pregnant
- Children who suffer from changes in emotional well-being
- Children who misuse drugs and alcohol
- Children who go missing for periods of time or regularly come home late
- Children who regularly miss college or education or do not take part in education

13.8 Child Criminal Exploitation (CCE): county lines

Criminal exploitation of children and vulnerable adults is a geographically widespread form of harm that is a typical feature of county lines criminal activity; drug networks or gangs groom and exploit children and vulnerable adults to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. The key to identifying potential involvement in county lines is missing episodes. The victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered by the DSL. Like other forms of abuse and exploitation, county lines exploitation:

- Can affect any child (male or female) under the age of 18 years
- Can affect any vulnerable adult over the age of 18 years
- Can still be exploitation even if the activity appears consensual
- Can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence

- Can be perpetrated by individuals or groups, males or females, young people or adults
- Is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted that exploitation as well as being physical can be facilitated and/or take place online. Staff will always report concerns to the DSL.

13.9 Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include:

- Unauthorised access to computers (illegal 'hacking'), for example accessing a college's computer network to look for test paper answers or change grades awarded
- Denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources
- Making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above

Students with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If concerns are raised about a student in this area, the DSL and Deputy DSLs will consider referring to the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where 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.

13.10 Domestic abuse

The Domestic Abuse Act 2021 recognises the impact of domestic abuse on children, as victims, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected".

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socioeconomic status, sexuality or background and domestic abuse can take place inside or outside of the home. Exposure to domestic abuse and/or violence can have serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life.

Children who witness domestic abuse may:

- Become aggressive
- Display anti-social behaviour
- Suffer from depression or anxiety
- Not do as well at college, due to difficulties at home or disruption of moving to and from refuges

The DSL and Deputy DSLs will be alert to signs of domestic abuse and will engage with other agencies including Operation Encompass to share information and to support the child and the family. The college will report to the relevant agencies any suspected domestic violence. The college will work with families, keeping them informed unless it is felt that there is a real risk to the safety of the child or someone else. Where this is the case, the risk will be made clear in the referral.

13.11 Homelessness

Being homeless, or being at risk of becoming homeless, presents a real risk to a child's welfare. The DSL (or Deputy DSLs) are to be aware of contact details and referral routes for the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and or discussion with the Local Housing Authority should be progressed as appropriate, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

In most cases, we will consider homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised that in some cases, some young people could be living independently from their parents or guardians, for example, through their exclusion from the family home, and will require a different level of intervention and support. Children's services will be the lead agency for these young people and the DSL (or Deputy DSLs) should ensure appropriate referrals are made based on the child's circumstances.

13.12 So-called 'honour-based abuse' (HBA)

So-called 'honour-based abuse' (HBA) encompasses 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. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be

aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of so-called HBA are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubts, staff should speak to the Designated Safeguarding Lead. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

13.13 Forced marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. The college has monitoring procedures to prevent forced marriage. Where forced marriage is suspected, the college will follow the usual safeguarding procedures. Statutory guidance and multi agency guidelines are available and college staff should contact the DSL using the college's published procedures.

13.14 Modern Slavery and the National Referral Mechanism

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. DSL and Deputy DSLs will work with all relevant agencies to ensure our students receive appropriate support throughout this process. Information on the National Referral Process can be found on the government website.

13.15 Child on child abuse

Children can abuse other children. This was formally referred to as peer-on-peer abuse and now is defined for clarity and transparency as child-on-child abuse and can take many forms and be an indicator of unmet needs. It can happen both inside and outside of college and online. This can include (but is not limited to) bullying (including cyberbullying); abuse within intimate partner relationships, sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexting and initiation/hazing type violence and rituals. All staff remain vigilant and are aware of this specific type of abuse so it can be reported as per the college's procedures. We understand and recognise that child on child abuse exists and are vigilant for signs of it. We will follow safeguarding procedures and create a culture so that students feel able to report it and that all children involved in any issues are dealt with sensitively and supported appropriately.

13.15.1 Sexual violence and sexual harassment between children

Sexual violence and sexual harassment can occur between two children of **any** age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. The college has a zero-tolerance approach to sexual violence and harassment.

The college also recognises the relationship between harmful sexual behaviour, misogyny and violence against women and girls. Through safeguarding, behaviour management and curriculum activities, the college seeks to challenge harmful attitudes and promote respectful relationships.

All staff understand it is important that **all** victims are taken seriously and offered appropriate support and are aware that the following groups are potentially more at risk:

- Girls
- Children with SEND
- LGBTQ+ children
- Looked After Children (LAC) or previously LAC

All staff understand the importance of:

- Challenging inappropriate behaviours
- 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", "part of growing up", "just having a laugh" or "boys being boys"
- Challenging behaviours (potentially criminal in nature), such as upskirting, grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them

KLM UK Engineering ensures all staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. We understand when referring to sexual violence it is referring to sexual offences under the Sexual Offences Act 2003 as described below:

- **Rape:** A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents
- **Assault by Penetration:** A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents
- **Sexual Assault:** A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another and can be withdrawn at any time during sexual activity and each time activity occurs.

- A child under the age of 13 can never consent to any sexual activity
- The age of consent is 16
- Sexual intercourse without consent is rape

When referring to sexual harassment, the college understands it to mean 'unwanted conduct of a sexual nature' that can occur online and offline. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. All staff are aware this can be part of a wider pattern of abusive behaviour or a standalone event which could include:

- Sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names
- Sexual "jokes" or taunting
- Physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes and displaying pictures, photos or drawings of a sexual nature
- Online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.
    - Consensual and non-consensual sharing of nudes and semi-nudes images and/or videos ○ Sharing of unwanted explicit content
    - Sexualised online bullying
    - Unwanted sexual comments and messages, including, on social media
    - Sexual exploitation; coercion and threats
    - Upskirting

- The college understands the initial response to a report from a child is important. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report
- The college will ensure that all students know how to report child on child abuse and that support is given both to the perpetrator and the victim. Parents and carers will be alerted to any reports of harmful sexual behaviour made by or about their child
- All incidents of harmful sexual behaviour will be logged by the DSL and reviewed regularly
- Where necessary, particularly when the victim and perpetrator are in the college, a risk assessment will be drawn up and shared with due regard for appropriate confidentiality. Local safeguarding partners will also be asked to contribute to the risk assessment where appropriate

Harmful Sexual Behaviour (HSB)

HSB is an umbrella term for when sexual behaviour is problematic, abusive and violent. It is treated as a child protection issue. Whilst the college understands that it is important to take into account the age and stage of

development of the child, the college recognises the age of consent and the law and the fact that where there is an age gap between children, usually of around two years or one of the children has a disability, advice will be sought regarding harmful sexual behaviour. The college will always seek help and advice from safeguarding partners where there is cause for concern.

The college recognises that historically across all education providers harmful sexual behaviour has been wide spread and has often been unreported. The college recognises that if HSB is not reported it does not mean that it does not happen. The college has a zero tolerance approach to sexual violence and harassment. The college will actively work to deter and prevent harmful sexual behaviour including and not limited to the following ways:

- Teaching about consent and harmful sexual behaviour during induction
- Have zero tolerance to unnecessary physical contact, derogatory language and negative comments about a person's appearance or comments of a sexual nature
- Recording and scrutinising all incidences of harmful sexual behaviour

The college will follow all procedures and practices outlined in KSCIE 2026 where incidents of HSB occur.

13.15.2 Upskirting

The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12 April 2019. 'Upskirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender, can be a victim.

All students will be taught about upskirting and its implications and how to report it. The college will follow its procedures for sexual harassment and other forms of child on child abuse to ensure the matter is dealt with.

13.15.3 Sending Nudes or Semi Nudes (Sexting)
For safeguarding purposes, nudes and semi-nudes include images and videos that are digitally altered or wholly generated using artificial intelligence, including deepfakes and 'deep nudes'. A depiction does not need to be a genuine photograph or recording for a safeguarding concern to arise. Concerns involving the creation or sharing of such material must be reported and managed under section 7.5, including its restrictions on handling imagery.

Sending Nudes or Semi Nudes also referred to as Sexting is when someone shares sexual, naked or semi-naked images or videos of themselves or others, or sends sexually explicit messages. Creating or sharing explicit images of a child is illegal, even if the person doing it is a child. A young person is breaking the law if they:

- Take an explicit photo or video of themselves or a friend
- Share an explicit image or video of a child, even if it's shared between children of the same age
- Possess, download or store an explicit image or video of a child, even if the child gave their permission for it to be created

If staff are made aware that a child has sent, received or been the subject of sexting, they should report it as a safeguarding incident. Staff should not view the image unless unavoidable. They should let the Designated Safeguarding Lead (DSL) know if they saw the image. The DSL will follow the guidance set out in Sexting in schools.

13.16 Bullying/Cyber-bullying

The college understands that bullying is harmful to children and will always take any reports of bullying seriously and respond appropriately. All staff understand that bullying may take different forms and may include racist or homophobic behaviour. Any such reported or observed incident will be dealt with in accordance with our anti-

bullying policy.

Bullying is behaviour by an individual or group, repeated over time, that intentionally hurts another individual or group either physically or emotionally. Bullying can take many forms (for instance, cyber-bullying via text messages or the internet), and is often motivated by prejudice against particular groups, for example on grounds of race, religion, gender, sexual orientation, or because a child is adopted or has caring responsibilities. It might be motivated by actual differences between students, or perceived differences. Stopping violence and ensuring immediate physical safety is KLM UK ENGINEERING's first priority but emotional bullying can be more damaging than physical; staff have to make their own judgements about each specific case.

Bullying involves an imbalance of power between the perpetrator and the victim. This could involve perpetrators of bullying having control over the relationship which makes it difficult for those they bully to defend themselves. The imbalance of power can manifest itself in several ways, it may be physical, psychological (knowing what upsets someone), derive from an intellectual imbalance, or by having access to the support of a group, or the capacity to socially isolate. It can result in the intimidation of a person or persons through the threat of violence or by isolating them either physically or online. The rapid development of, and widespread access to technology, has provided a new medium for 'virtual' bullying, which can occur in or outside college. Cyber-bullying is a different form of bullying and can happen at all times of the day, with a potentially bigger audience who potentially have more content to share.

KLM UK ENGINEERING has a Harassment and Bullying policy in place. This sets out our aim of ensuring no employee or student becomes a victim of bullying and the work that we carry out in college fosters an environment where bullying behaviour is known to be unacceptable. In some circumstances, it will be necessary to treat it as a safeguarding incident, constituting child on child abuse, and other agencies will be informed. Bullying, cyberbullying and online safety are topics covered by targeted curriculum time.

The college is aware that certain groups of students may be more prone than others to bullying. These could include students with SEND, medical issues, disabilities and students who identify as LGBTQ+. Any bullying incident regarding a student with SEND will be reported to the DSL who will liaise with the Head of Technical College offer support. All students who may identify as LGBTQ+ will be informed of a safe space for them to speak out and how to share their concerns with members of staff.

All bullying incidents are categorised, recorded centrally and reviewed regularly.

13.17 Online safety

We recognise that students' use of the Internet is an important part of their education however there are risks of harm associated with its use as the use of technology has become a significant component of many safeguarding issues. Technology often provides a platform that facilitates child sexual exploitation, radicalisation and sexual predation.

KLM UK Engineering has an IT, Communication and Online Safety policy that addresses in more detail how we minimise those risks in college. We also recognise that all members of staff and volunteers must always be mindful of the need to follow our policy of acceptable use of our IT equipment.

Staff should be aware that artificial intelligence technologies may be used to facilitate abuse, harassment, exploitation, radicalisation, grooming, impersonation and the creation of AI-generated intimate imagery. Any concerns regarding AI-enabled safeguarding risks should be reported using standard safeguarding procedures.

13.17.1 IT, Filtering and Monitoring

KLM UK Engineering IT Department implements all filtering and monitoring infrastructure across the organisation. When connected to the company network, online activity is monitored through the Palo Alto Firewall, which provides category-based filtering to help identify potential safeguarding concerns. A weekly report is generated by IT and processed as detailed below.

Filtering and Monitoring Role and Responsibilities

Designated Safeguarding Lead (DSL)

The DSL will:
- Review the filtering and monitoring reports relating to students
- Record concerns and actions using the college safeguarding reporting system
- Assess risk and take appropriate safeguarding action, including escalation to external agencies if required

Head of Technical College

The Head of Technical College (DDSL) will:

- Review the filtering and monitoring reports relating to staff
- Act in line with the Staff Code of Conduct where concerns indicate a potential breach of conduct.
- Escalate concerns to HR, the Managing Director, or the LADO as appropriate.

IT Department

The IT Department will:
- Maintain filtering and monitoring systems.
- Ensure reports are produced on time and securely transmitted.
- Immediately flags high-severity alerts if they are seen (e.g., harmful sexual content, self-harm searches, extremism-related content) to the appropriate safeguarding lead.

Process for Reviewing Reports

1. Receive the weekly report
2. Log any alert securely in the Safeguarding and Wellbeing Log
3. Assess severity using the low/medium/high risk framework.
4. Take action as appropriate:
- **Low risk:** Note and continue to monitor.
- **Medium risk**: Speak to the student/member of staff; document discussion and next steps using the Behaviour Policy or Staff Code of Conduct.
- **High risk:** Immediate safeguarding or disciplinary response.
5. Record all decisions and actions, including the rationale, in the Safeguarding and Wellbeing Log
6. Close the case when actions are complete.
7. Report patterns or repeated concerns as part of termly safeguarding reporting governors.

Risk Categories and Training

The breadth of issues classified within online safety is considerable, however we understand they can be categorised into four areas of risk:

- **Content**: being exposed to illegal, inappropriate or harmful material; for example pornography, racist or radical and extremist views
- **Contact:** being subjected to harmful online interaction with other users; for example commercial advertising as well as adults posing as children or young adults
- **Conduct**: personal online behaviour that increases the likelihood of, or causes, harm; for example making, sending and receiving explicit images, or online bullying
- **Commerce**: risks such as online gambling, inappropriate advertising, phishing and/or financial scams.

Staff will be trained to understand these areas, risks of the topics below and to report concerns linked to these

as required, via the Safeguarding Reporting Form:

Disinformation - fake or misleading stories created and shared deliberately often by a writer who might have a financial or political motive
Misinformation - This also means fake or misleading stories, but in this case the stories may not have been deliberately created or shared with the intent to mislead
Conspiracy theories - offer a simplified model for things that cannot be explained or easily understood. They typically involve an 'alternative' explanation for an event to those provided by governments or official international bodies, sometimes suggesting a group, individual or organisation is responsible or hiding information from the public
Fake News - is another term that is widely used that means the news is not reliable or truthful. It is also a used to refute a claim, which could in fact be true
Students have training on how to use college IT systems and equipment upon induction.
Misuse of Generative AI – can be used to create materials that encourage misinformation

Student Training

All students receive training during induction on the safe and responsible use of college IT systems and equipment, including:
- Acceptable use expectations, including the safe and acceptable use of AI
- Online safety and digital wellbeing
- How to report concerns or inappropriate content
- Risks associated with artificial intelligence platforms including misinformation, manipulation, deepfakes, impersonation, image generation, online exploitation and radicalisation content
- Risks related to online misinformation and manipulation

Staff will remain alert to the misuse of AI technologies where these may place learners at risk or be used to facilitate abuse, bullying, exploitation or inappropriate contact. Staff safeguarding updates will include recognising AI-enabled abuse, including fabricated intimate imagery and impersonation, and applying the reporting procedures in sections 7.1 and 7.5. Staff will be reminded that fabricated imagery can cause harm and that uncertainty about whether material is genuine must not delay reporting to the DSL or Deputy DSLs.

Ongoing Quality Assurance

In addition to the processes detailed above, we will complete the following actions to continue to improve our filtering and monitoring procedures:
The annual review of filtering and monitoring effectiveness will explicitly consider AI services accessible to students, including image-generation tools and conversational platforms, and whether existing controls and reporting arrangements address the risks identified. The DSL and IT Department will record identified limitations and agreed actions, including arrangements for escalating urgent concerns, and include these in existing governor assurance reporting.

- Conduct an annual review of filtering and monitoring effectiveness using the DfE Technology audit tool
- Conduct an annual review of IT permissions
- Ensure Governor oversight through termly assurance reporting and include online safety in safeguarding audits
- Complete an annual testing programme for filtering systems.

13.18 Use or abuse of drugs

Changes in behaviour, mood swings, secrecy and violent outbursts can be signs of substance misuse in children. Where student use or abuse of drugs is suspected, the college will work with the family and other agencies. The

college will follow safeguarding procedures where the use or abuse of drugs is suspected by a parent, carer or other person where it directly affects the child.

13.19 Faith abuse

Understanding more about a student's faith and the role faith plays in family life is important for anyone working with children, families or communities. It can help when considering appropriate ways to approach conversations around child protection and child safety. The college will protect children irrespective of cultural sensitivities; any concerns will be investigated respectfully without detriment to the child's welfare or safety and, where required, referrals completed to appropriate agencies. Under UK law, different practices are no excuse for child abuse, neglect or exploitation.

13.20 Gangs and youth violence

Children and young people involved with, or on the edges of, gangs might be victims of violence or they might be pressured into doing things like stealing or carrying drugs or weapons. They might be abused, exploited or put into dangerous situations. For lots of young people, being part of a gang makes them feel part of a family so they might not want to leave. Even if they do, leaving or attempting to leave can be a scary idea. They might be frightened about what will happen to them, their friends or their family if they leave. The college treats any association with gangs as a safeguarding concern. A useful website offering advice to teachers and parents can be found here: NSPCC Gang Advice. The college takes all reasonable steps to keep children safe from gangs. This includes but is not limited to working to make sure the college and its environs are safe from intruders, running workshops and assemblies on the topic, mentoring 'at risk' students, working with parents, working with the police force and other agencies.

13.21 Mental health

All staff should be aware that mental health problems can, in some cases, be an indicator that a student has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe students 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. Where students have suffered abuse, neglect, exploitation, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these student's experiences can impact on their mental health, behaviour and education.

Mental illness and suicidal thoughts are assessed as safeguarding concerns. Some signs and symptoms of mental health issues that staff should be aware of include:

- Becoming withdrawn from friends and family
- Persistent low mood and unhappiness
- Tearfulness and irritability
- Worries that stop them from carrying out day to day tasks
- Sudden outbursts of anger directed at themselves or others
- Loss of interest in activities that they used to enjoy
- Problems eating or sleeping

Staff should report any symptoms or concerns about a student to the DSL using the Logging a Concern form.

13.22 Trafficking

Child trafficking is a very serious issue which can have a devastating and lasting impact on its victims. Children can be trafficked into, within and out of the UK.

"Trafficking of persons" shall mean the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation.

Children may be trafficked from other countries for a variety of reasons. There are several factors in the country of origin which might make children vulnerable to being trafficked. The factors listed below are by no means a comprehensive list:

- Poverty
- Lack of education
- Discrimination
- Cultural attitudes
- Grooming
- Dysfunctional families
- Political conflict and economic transition
- Inadequate local laws and regulations

The college actively monitors for signs of child trafficking at admission of a child to the college. This includes and is not limited to scrutinising documents and asking key questions at interview. Staff who suspect a child is being trafficked should share information with the DSL and treat it as a safeguarding incident.

13.23 Prevent and Radicalisation

What is Extremism? - The Government has defined extremism as "vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs". This also includes calls for the death of members of the British armed forces.

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

What is Radicalisation? - Students can be drawn into violence or they can be exposed to the messages of extremist groups by many means. The risk of radicalisation is the product of a number of factors and identifying this risk requires that staff exercise their professional judgement, seeking further advice as necessary. It may be combined with other vulnerabilities or may be the only risk identified.

13.24 Young Carers

At KLM UK Engineering, we are alert to the needs of young carers, recognising that caring responsibilities can impact on their attendance, attainment, behaviour and wellbeing. We identify students who are young carers early through our additional needs form to ensure that they receive support at the right time and by the appropriate services including additional support from external partners (e.g. Carers Matter), or local authority and health services.

13.25 Safeguarding students with medical conditions

The fact that there has been an incident relating to the management of a child or young person's medical condition (including allergies) would not in and of itself warrant a referral to local safeguarding partners. A safeguarding referral would only be needed where an incident highlighted concern that the child or young person might be at an increased risk of being neglected, abused or exploited by persons inside or outside of their family unit because of their medical condition. This might occur where relevant information about a child or young person's medical condition is not provided to a school, college or setting, or where they are repeatedly sent without essential medication, thereby putting the individual at risk. In these instances, a referral would be made.

14.0 Student behaviour

We will always aim to maintain a safe and calm environment by expecting good behaviour from our students in accordance with the Behaviour and Attitudes Policy.

We are aware that any physical response from a member of staff to a student's poor behaviour could lead to a child protection concern being raised by the child or parent/carer.

- No member of staff will use force when dealing with a student's breach of our behaviour policy unless the potential consequences of not physically intervening are sufficiently serious to justify such action. All force will be reasonable and no more than is needed to ensure the situation is de-escalated
- We will always record any occasion when physical intervention has been necessary
- We will provide de-escalation training for staff
- We will always notify parents or carers of any such incident where the student is under 18 or a vulnerable adult

We understand and recognise that child on child abuse exists and are vigilant for signs of it. We will follow safeguarding procedures and create a culture so that students feel able to report concerns and that all students involved in any issues are dealt with sensitively and appropriately.

15.0 Working together with students and parents/carers:

15.1 Student information

We recognise the importance of keeping up-to-date and accurate information about students. We will regularly ask students to provide us with the following information (and to notify us of any changes that occur):

- Names and contact details of persons with whom the child normally lives
- Names and contact details of all persons with parental responsibility, or next of kin
- Emergency contact details (at least two accurate contacts on file)
- Name and contact details of G.P.
- Any other factors which may impact on the safety and welfare of the child
- We will store all data securely in line with data protection protocols

15.2 Private fostering

Sometimes a child is in the care of someone other than their biological parents or legal guardian. The college will do all that is practicable to find out this information during the college's admission. Sometimes the child transfers to a private foster care arrangement during their time at the college. Staff should inform the DSL if they believe this is the case. If it is found that a child is being looked after by someone for longer than 28 days, the college will inform the local authority.

15.3 Special Educational Needs and Disabilities (SEND)

The college recognises that students with special educational needs and disabilities are more vulnerable, and extra care must be taken to ensure they are safeguarded. The DSL and Deputy DSLs will work closely with the Head of Technical College and parents and carers where appropriate to ensure:

- All staff are aware of the children with SEND and know how to make provision for them
- Staff are aware of safeguarding implications when students with SEND are in periods of transition such as changing settings and on educational visits
- That children with SEND may be more prone to bullying and exploitation including online.
- If a child with SEND is identified as being a victim of abuse, the Head of Technical College will be notified and involved in their support

15.4 Confidentiality and Data Protection

Information about students given to us by the children themselves, their parents or carers, or by other agencies

will remain confidential. Staff will be given relevant information only on a "need to know" basis in order to support the child if that is necessary and appropriate. We are, however, under a duty to share any information which is of a child protection nature. We understand that this is in the best interests of the student and overrides any other duties we have regarding confidentiality and information sharing. We have a duty to keep any records which relate to child protection work undertaken by us or our partner agencies and to ensure that these are kept apart from the main student record, stored securely and only accessible to key members of staff. We also have a duty to send copies of these records to any provider to whom the student transfers.

We will ensure that staff are trained on data sharing and are aware of when and how information can be shared with outside agencies and third parties. Staff should always have due regard for safeguarding and ensure that any information that is shared is logged and referred to the DSL. We will have due regard for DFE Data Protection guidance for school (DFE,2024b) to ensure we comply with data protection law; develop data policies; understand what staff and student data to keep; and prevent personal data breaches. For more detail, please see the college GDPR policy.

15.5 Referrals to partner agencies

If we have a reason to be concerned about the welfare of a child, we will always seek to discuss this with the child's parents or carers in the first instance. On occasion, according to the nature of our concern, it may be necessary for us to make a referral to Children's Services when to do otherwise may put the child at risk of further harm either because of delay, or because of the actions of the parents or carers.
If a student works with a third party on the college premises we will make it clear that adults are subject to the same safeguarding follow up procedures where an allegation is made. This includes referral to the Local Authority Designated Officer. We will share this policy with all third party providers working with students.

15.6 Sharing our policy

This policy is available to all parents of students and prospective students via our website and a hard copy can be made available on request. All college staff and volunteers are given the policy at induction and are reminded to read it regularly.

Copies of our policy are available to all visitors of the college and a summary of our procedures is provided before entering the college.

16.0 Whistleblowing

We recognise that children/young people cannot be expected to raise concerns in an environment where staff fail to do so. KLM UK ENGINEERING has a whistleblowing policy for all staff to encourage them to raise concerns and e-learning on this is completed by all staff during their induction.

17.0 Monitoring and reviewing our policy and practice

Our Designated Safeguarding Lead will continually monitor our child protection and safeguarding practices and bring to the notice of the Head of Technical College any weaknesses or deficiencies. The Governing Body, Head of Technical College and Designated Staff will work together on any aspect of safeguarding and child protection that is identified as an area for development.

Annexe 1

Logging a Safeguarding or Wellbeing Concern Form

Please refer to section 7.0 of the Safeguarding Policy as necessary to review reporting procedures and the principles we adhere to regarding disclosures

Student's Full Name		Student's ILR Number (if known)	In blue
Date Raised		Location of disclosure	

SECTION ONE: The situation as described or observed **Please write factually**. Use direct quotes, if relevant
Who is/has been involved? (name of students and adults where relevant) What happened? Where did it take place? How often / how long ago?
SECTION TWO: Your opinion Please offer your opinion about what you have heard/seen/been told and link to any previous concerns
SECTION 3: Have you taken any action regarding the situation prior to filling in this form?

Your Name		Your Signature	
Your Job Title			

Annexe 2

Schedule of checks and Safeguarding and Prevent training for specific KLM UK Engineering staff groups

Staff group	Possible regulated working with under 18s	Enhanced DBS?	Training	Frequency of training	Delivery method
DSL and DDSLs	Y	Y	- L4 safeguarding training -Refresher training -Training updates from NSPCC or other external provider re. KCSIE	-Upon appointment - Every 2 years -Annually	All via external providers
Instructors	Y	Y	-Induction safeguarding training - Policy update training (including KCSIE update) - Cohort induction training - CPD to support emerging needs of cohorts (see CPD plan)	- Upon induction - Annually: Sept - Monthly	Via online course In person In person/via bulletins
Tech College managers	Y	Y	-Induction safeguarding training - Policy update training (including KCSIE update) - Cohort induction training - CPD to support emerging needs of cohorts (see CPD plan)	- Upon induction - Annually: Sept - As required	Via online course In person In person/via bulletins or emails
Technical College admin staff	Y	Y	- Induction safeguarding training - Policy update training (including KCSIE update) - Cohort induction training	- Upon induction - Annually: Sept	Via online course In person
Governors	N	Y	- Annual policy update training (including KCSIE update)	- Annually: Sept	Online via NSPCC Schools courses online | NSPCC Learning
Base maintenance staffBase maintenance staff	N	N	- Understanding of safeguarding guidance given - Policy update training - Reporting refresher training	- Upon induction -Annually: Sept - Annually: Oct	Via online course Via bulletins Via bulletins
Mentors	Y	Y	- Understanding of safeguarding guidance given - Policy update training - Reporting refresher training - Training meeting about apprentice's needs	- In induction meeting - Annually: Oct - Annually: Oct - Where appropriate to the student	In person Via bulletins/in person Via bulletins/in person In person/via Teams
Apprentices	N	N	-Understanding rights and responsibilities for under and over 18s	-Upon induction, and/or as part of enrichment	In person