



Safeguarding Policy

London School of Social and Management Sciences

Other reference Points:

- Health and Safety at Work Act 1974
- Data Protection Act 2018
- Safeguarding Vulnerable Groups Act 2006
- Equality Act 2010
- Protection of Freedoms Act 2012
- Counter Terrorism and Security Act 2015
- The UK Visa and Immigration <https://www.gov.uk/government/organisations/uk-visas-and-immigration>

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1. Introduction

- 1.1 The College is committed to supporting and promoting the welfare of staff, students, and visitors and is committed to the provision of a safe environment conducive to work, study and the enjoyment of a positive experience for all members of its community.
- 1.2 The College recognises that within the course of its activities its staff and students may encounter children (e.g., individuals who are under 18 years old) or vulnerable adults (e.g., those over 18 who are rendered vulnerable to harm or exploitation due to their personal situation and/or social circumstances).
- 1.3 The College wishes to ensure that it maintains the highest possible standards to meet its responsibilities to protect and safeguard the welfare of children and vulnerable adults and is therefore committed to working in partnership with other organisations (as appropriate) to facilitate this.
- 1.4 In the discharge of its functions, and in implementing this policy and procedure, the College will have regard to its duty of care and other legal obligations, such as those it owes under the Health and Safety at Work Act 1974, the Data Protection Act 2018, the Safeguarding Vulnerable Groups Act 2006, Equality Act 2010, the Protection of Freedoms Act 2012 and the Counter Terrorism and Security Act 2015.
- 1.5 This Policy is designed to provide clear guidelines and procedures for identifying risk, reporting concerns, and taking appropriate action.
- 1.6 Examples of areas where the College may have contact with children and adults who may be vulnerable may include (though not be confined to) the following:
 - 1.6.1 Teaching, supervision and support of students.
 - 1.6.2 Summer schools, school visits, and other events such as work experience.
 - 1.6.3 Apprenticeships.
 - 1.6.4 Outreach or widening participation activities taking place on or off campus.
 - 1.6.5 Research subjects.

- 1.6.6 Attendance at private functions run commercially by the College.
- 1.6.7 Conferences.
- 1.6.8 On placements and in other professional settings.
- 1.6.9 Field trips, excursions, volunteering and other social activities.
- 1.7 Examples of the type of situations which may result in the College implementing this policy and procedure may include:
 - 1.7.1 Where a child or adult raises an allegation of abuse, harm, or other inappropriate behaviour.
 - 1.7.2 Where a student or staff member discloses information involving themselves or family members which gives rise to possible concerns that a potential perpetrator may be harming or abusing vulnerable individuals.
 - 1.7.3 Where there are suspicions or indicators that a child or adult is being abused or harmed or is at risk of exploitation, (including radicalisation).
 - 1.7.4 Where a concern is raised that an individual presents a risk of abuse or harm towards a child or adult in relation to, for example, his/her criminal convictions, the downloading, possession of/or distribution of inappropriate images or extremist material. If there is concern that a member of staff or student may present such a risk, the College will invoke its risk assessment procedure (see section 6.1 below) and/or take action under another relevant policy.
 - 1.7.5 Where concerns arise that a student or member of staff is vulnerable to radicalisation and there is an identifiable risk of being drawn into terrorism.

[It is recognized that it can be difficult to identify these indicators – though all staff will receive training on the process and procedures to follow, should they believe this to be the case; for instance, where changes are observed in a child or adult’s appearance or behaviour that could be related to exploitation, harm, or abuse, including radicalisation].

2. Definitions of home and international students

2.1 Home Student

To be classed as a home student you normally need to meet all of the following criteria on the first day of the first academic year of the course:

- 2.1.1 You are settled in the UK (this means there is no immigration restriction on the length of your stay).
- 2.1.2 You are ordinarily resident in the UK and have been for the full three years before the first day of the academic year. (Ordinarily resident means that your main home is in the UK, and you are choosing to live in the UK.)
- 2.1.3 The main reason for you being in the UK was not to receive full-time education.

2.2 International students

- 2.2.1 If you do not fall under the home fee definition, then you will be classed as an international student. From 1 August 2021, new EU students will also pay international tuition fees.

2.3 EU Students who registered before 1 August 2021

- 2.3.1 If you are an EU student and start your studies on or before 31 July 2021, you will be classed as a home student. To be eligible you must:
 - 2.3.2 Register before 1 August 2021
 - 2.3.3 be an EU national, or the relevant family member of a non-UK EU national, who is in the UK as a self-sufficient person or as a student, or the relevant family member of a UK national,
 - 2.3.4 have been ordinarily resident in the European Economic Area and/or Switzerland and/or the overseas territories for the three years before the first day of the first academic year of the course,
 - 2.3.5 have not been a resident wholly or mainly for the purpose of receiving full-time education.

3. Policy relevance

- 3.1 This safeguarding policy is relevant to all learners regardless they are classified as home, EU or international students.

4. Under 18 international students

- 4.1 If you are under 18 you need to provide additional documents at the time of admission to any of the course the College is offering to international students in case:
 - 4.1.1 You are travelling on your own.
 - 4.1.2 You are travelling with someone who is not your parent or guardian.

4.2 Travelling on your own

4.2.1 You can travel to the UK without an adult (someone 18 or older).

4.2.2 You must have written consent from both parents (or one parent if they have sole responsibility) or your legal guardian. This must confirm they consent to:

4.2.2.1 your visa application

4.2.2.2 your living arrangements and care in the UK

4.2.2.3 your travel to the UK

4.3 They also need to provide proof that you have somewhere suitable to live during your stay in the UK, including:

4.3.1 the name and date of birth of the person that you will be staying with an address where you will be living.

4.3.2 details of your relationship to the person who will be looking after you.

4.3.3 consent in writing so they can look after you during your stay in the UK.

4.4 Your parent, guardian or school must tell the relevant local authority about your visit if either of the following are true:

4.4.1 You are under 18 and have a disability.

4.4.2 You are going to be looked after for more than 28 days by someone who is not a close relative (called 'private foster care').

5. Travelling with an adult

5.1 If you travel to the UK with an adult (someone 18 or older), you need to identify them in your visa application:

5.1.1 Their name will appear on your visa, and you will be refused entry to the UK if you arrive in the UK without them.

5.1.2 You can identify up to 2 adults in your visa application, and your visa will only be valid if you travel with at least one of them.

5.1.3 The adult can apply for a visa at the same time, but you must each complete separate application.

[Note: The policy guideline 4 and 5 for under 18 international students is copied exactly from the UK Visa and Immigration for Short term Study visa and Standard visitor visa for study purpose. For more information, please refer to the following links:

<https://www.gov.uk/visa-to-study-english/documents-you-must-provide>

<https://www.gov.uk/standard-visitor/if-youre-under-18>

6. Safeguarding Policy Statement for under 18 International Students

- 6.1 The College safeguarding policy confirms that, if you are under the age of 18 at the point of enrolment, you must appoint a guardian who resides in the UK preferably in London. Your guardian would typically be a family member, or a close friend of the family who has agreed to take on this role. If these two options are not available to you, another option is to approach an accredited guardianship service which will be able to provide this support on a privately arranged basis. Here is the link to the Association for the Education and Guardianship of International Students (AEGIS) <https://aegisuk.net/>
- 6.2 The College will not entertain an admission if you are an under 18 international student unless you are meeting our Safeguarding Policy sections 4 and 5.

7. Policy

- 7.1 The College will take all safeguarding concerns (including suspicions) seriously and will report concerns promptly.
- 7.2 The College has processes in place to check the suitability of staff and students whose duties and responsibilities involve regular contact or supervision of children or adults who may be vulnerable. The College is committed to seeking to ensure that appropriate suitability checks are carried out in relation to staff including criminal record checks and other checks where appropriate.
- 7.3 Safeguarding referrals to the relevant statutory authority will be made on the basis of identified and considered risk.
- 7.4 College staff dealing with students or staff who are subject to safeguarding concerns, will consider what support may be offered to them both internally

(assistance programmes for Staff/Students) and the signposting of external services that may be appropriate (i.e., local GPs, Mental Health Services).

8. Scope

8.1 Definition of vulnerability

For the purposes of this Policy the College defines vulnerability as being when a child or adult is at risk of exploitation, harm or abuse, including the risk of radicalisation. While the definitions of “vulnerable adult” and “child” are set out below, the policy notes that a person can become vulnerable as a result of specific circumstances or situation which may increase the risk of exploitation.

8.2 Vulnerable Adult

The College defines a vulnerable adult as a person aged 18 or over who is [or may be], in need of services by reason of mental or other disability, age or illness, and who is [or may be], unable to take care of him or herself, or unable to protect him or herself against significant harm, abuse or exploitation, including being drawn into terrorism.

8.3 Definition of a child

The College defines a child as a person who is under the age of 18. The fact that a Child has reached 16 years of age, is living independently or is in Further/Higher education does not change his or her status for the purpose of this Policy.

9. Designated Safeguarding Officers

9.1 The Head of HR and the Head of Academic Services are the College’s Designated Safeguarding Officers, respectively for staff and students. Their [or their nominees’] responsibilities, include:

- 9.1.1 Undertaking relevant training in safeguarding procedures and ensuring their knowledge is kept up to date.
- 9.1.2 Acting as a point of contact for those who have safeguarding concerns, receiving information, and recording those concerns.
- 9.1.3 Acting upon concerns as appropriate in the circumstances for example by making external referrals to social services or police.
- 9.1.4 Monitoring the implementation of this policy and procedure.

9.2 In addition to the explicit responsibilities set out above, the established management structures within each department and relevant service area of the College have an implicit responsibility to ensure staff and students are aware of its Safeguarding Principles and Procedures and are able to refer concerns appropriately.

9.3 Furthermore, managers and staff in academic departments and services will build approaches which promote safeguarding to reduce the potential for abuse and to promote wellbeing.

10. Reporting Safeguarding Concerns

10.1 It is the remit of Social Services and/or the Police to investigate safeguarding concerns. However, the College will undertake a risk assessment before making a referral to such an external agency. If a member of the College (staff or student body) has any immediate risk concerns (including outside normal College hours), they may refer directly to the Police or Social Services. Alternatively, they should follow the internal referral process set out below. If a direct referral is made, the member of staff or student should inform the College Designated Safeguarding Officer at the earliest opportunity.

10.2 It is better to refer any safeguarding concern, to enable a risk assessment to take place, than not to make one because you are not yet certain.

10.3 Whilst in the process of attending external fieldtrips as an integral part of a course of study, the same due diligence to Safeguarding will apply. Should any Child, Vulnerable Adult or member of Staff experience any safeguarding issues – these should be reported immediately [see 5.4 below], so that suitable help and support can be provided.

10.4 If a person holds a dual role [for example, they are employed by and study at the College], then a concern may be raised, and action taken under both the staff and student procedures. [If you are not sure which procedure to use to raise the concern [in line with 5.3 above], you may contact the Designated Safeguarding Officer by phone, or discuss with your line manager or tutor].

10.5 If a Designated Safeguarding Officer is not available, or the safeguarding concern involves (for example) a concern against him/her, then the principal should be contacted.

11. Risk Assessment

11.1 If a safeguarding concern is raised with a Designated Safeguarding Officer, a risk assessment will be undertaken to assess the appropriateness of a referral to Social Services or the Police.

11.2 The Designated Safeguarding Officer (or nominee) is responsible for ensuring that the risk assessment and its outcome are recorded, and appropriate follow-up actions (where deemed necessary) are undertaken.

11.3 The College will liaise with other partner agencies as appropriate in order to address the safeguarding concerns identified.

12. Action by the College

12.1 The College reserves the right to take action under its disciplinary procedures should it later receive information that suggests that its Student Conduct Standards may have been breached.

12.2 Staff or students who are dismissed from the College because of safeguarding concerns will be reported to the Disclosure and Barring Service and any relevant professional body.

12.3 Support from internal or external services will be provided as appropriate for any individuals, staff, or students, impacted by safeguarding issues.

13. Retention of Information

13.1 Written records of any safeguarding concerns will be retained for as long as is necessary for the purpose for which it was obtained or as legally required or lawfully permitted.

13.2 Such written records will be held centrally and separately from a member of staff or student's personal records.

14. Training

- 14.1 All staff and students whose roles and responsibilities include regular contact with children, and potentially vulnerable individuals, will receive training and guidance appropriate to their role. They will also be made aware of this policy, procedures and related guidance.

15. Monitoring and Evaluation

- 15.1 The Designated Safeguarding Officer will record any incidents relating to safeguarding concerns and will report them in an anonymised form to the Principal's Executive Group on a yearly basis. This report will be confidential and if any concerns or patterns of abuse emerge these will be dealt with appropriately.

16. Emergency contact

If you consider that a student / staff member is at risk of immediate harm, building security personnel should be summoned immediately (if provided), and the Police called simultaneously on 999. [POLICE SHOULD ALWAYS BE CALLED - if the building security personnel is not provided on site.

17. Review of Policy and Procedures

- 17.1 The principal is responsible for overseeing and updating this policy and procedure, particularly with respect to the College's and relevant external requirements. This policy and procedure will be formally reviewed every three years and updated as appropriate.