



## **Safeguarding Policy and Procedures**

### **Contents**

1. Key things about this policy
2. Delivering on our commitment to safeguarding
3. Responsibilities and Procedures: Who does what
4. Safeguarding Pathways How we deal with safeguarding concerns
5. Good practice: Confidentiality, Information Sharing and Managing Records
6. Good Practice: Safer Recruitment
7. Good Practice: Our Commitment to working with other agencies
8. Good practice: Guidance on appropriate behaviours and safer situations

### **Appendices**

Appendix 1 – Pathway 1 for Safeguarding concerns about the actions of non-staff

Appendix 2 – Pathway 2 for Safeguarding concerns about the actions of staff members

Appendix 3 – Pathway 3 for Safeguarding concerns about Staff/Student relationships

Appendix 4 – Pathway for Designated Safeguarding Officer when dealing with a concern

Appendix 5 – Advice for dealing with a student's safeguarding concern

Appendix 6 – Safeguarding Concern Reporting Form (SEL)

Appendix 7 – Examples of Abuse or Harm

Appendix 8 – Signs and Symptoms of Harm and Abuse

Appendix 9 – Factors to help identify vulnerability to radicalisation

Appendix 10 – List of Relevant Policies and Resources

Appendix 11 – Abbreviations commonly used in safeguarding literature

Appendix 12 – Key Contact Numbers

*Everyone shares responsibility for safeguarding and promoting the welfare of children and young people.*

*(Working Together to Safeguard Children DCSF, 2010)*

## **1. Key things about this policy**

### **1.1 The purpose of this policy**

The purpose of this policy is to:

- *Foster a safe environment for all children and vulnerable adults associated with LMA*
- *Create a culture where concerns about children and vulnerable adults and others that we know about can be reported and addressed quickly*
- *Define key roles, responsibilities and procedures in safeguarding activities*

### **1.2 Who this policy applies to**

Our safeguarding policies and expectations of behaviour apply to:

- *All individuals working in and on behalf of LMA. This includes volunteers, contracted employees and subcontracted provision and off-site delivery partners*
- *Our students*

### **1.3 Who the policy aims to protect**

This policy seeks to protect vulnerable individuals and especially:

- *Any individual under the age of 18*
- *Asylum seekers who are under 18 and/or who are living independently from their parents*
- *An adult in other ways defined as vulnerable (below)*

A vulnerable adult, which some people now refer to as ‘an adult at risk’, is defined in the Safeguarding Vulnerable Groups Act 2006 as someone 18 years or older who has:

- *A dependency upon others, or a requirement for assistance from others, in the performance of basic physical functions*
- *Severe impairment in their ability to communicate with others*
- *An impairment in their ability to protect themselves from assault, abuse or neglect*
- *Or has been detained in lawful custody or is being supervised as a result of a court order*

***Although, some procedures may differ slightly, any reference to students should be understood as applying to any of these categories as appropriate.***

### **1.4 What we mean by safeguarding**

Safeguarding means ensuring the overall safety and wellbeing of individuals. It is not limited to concerns relating to sexual activity. Safeguarding concerns can include any form of neglect, harm, or exploitation. Our responsibility to act on safeguarding concerns covers all aspects of students’ lives. Detailed examples of safeguarding concerns are set out in Appendix 7.

By safeguarding we mean:

- *Protecting children, young people and vulnerable adults from maltreatment and exploitation*
- *Preventing the impairment of children and young people's health and wellbeing*
- *Ensuring that children and young people are growing up in circumstances consistent with the provision of safe and effective care*

### **1.5 Transparency and Complaints**

We will ensure our Policy and Procedure is made widely available to staff, students and parents/carers by publishing it on our website. Any individuals with complaints about our handling of safeguarding issues will signposted to our Compliments and Complaints Policy. This policy will contain a confidential route for safeguarding complaints to the Head of Student Services.

### **1.6 What we will do to keep this policy at the cutting edge**

This policy will be revised, monitored and implemented in collaboration and following consultation with partners, parents/carers and students.

This safeguarding policy will be reviewed annually by the Safeguarding Lead.

***Any student or member of staff who has ideas about how we can improve our safeguarding should contact the Principals or Student Services in writing as soon as possible.***

## **2. Delivering on our commitment to safeguarding**

### **2.1 Our Guiding Principles**

LMA is committed to fostering the well-being and development of all our students. We recognise our responsibility, both to safeguard our students and support other safeguarding agencies.

Our guiding principles for safeguarding are:

- *The welfare of the child or vulnerable adult is paramount*
- *All children and vulnerable adults regardless of age, gender, ability or disability, race, faith, language or sexual identity, have the right to protection from harm*
- *All allegations and suspicions of harm will be taken seriously and responded to swiftly, fairly and appropriately*
- *Staff, students and volunteers are expected to work in partnership within LMA and with other safeguarding bodies to promote students' wellbeing and development*

### **2.2 What we aim to do**

LMA will strive to:

- *Be proactive in ensuring the safety of young people and vulnerable adults*
- *Promote a culture where everyone can be confident that their legitimate safeguarding concerns will be listened to sensitively and appropriate action taken*
- *Provide clear guidelines and procedures for **all staff** so they can respond appropriately to safeguarding concerns*

- Offer support to staff and students who have any safeguarding concerns (including referral to external agencies where this is deemed appropriate)
- Act promptly and diligently on any safeguarding concerns
- Liaise with the appropriate key partners and develop collaborative working practices which facilitate and promote safeguarding within LMA and the wider community

### 2.3 Key steps we will take

We will:

- Inform and remind staff and students of our safeguarding procedures and their responsibilities to promote safeguarding
- Make our safeguarding policy and procedures easily accessible in electronic and paper format
- Designate a Lead Safeguarding Officer to act as the link with other agencies
- Designate other Safeguarding Officers to give advice and handle safeguarding referrals
- Conduct thorough risk assessments for all College activities and keep them updated
- Provide resources to improve students' personal safety and their awareness of these issues

## 3. Responsibilities and Procedures: Who does what

### 3.1 Safeguarding is everyone's business

The table below summarises safeguarding responsibilities in LMA.

Safeguarding Role	Responsibilities	Relevant people
<b>All Students</b>	<ul style="list-style-type: none"> <li>● To act in ways that avoids or reduces risk for themselves and other students.</li> <li>● To inform a staff member where they have a serious concern about their own or another student's well being.</li> </ul>	All students
<b>All Staff</b>	<ul style="list-style-type: none"> <li>● To be vigilant over safeguarding students</li> <li>● To act upon a suspicion about a student's safety or deal with an actual disclosure, by speaking with a safeguarding officer. (See Section 4 for definitions)</li> <li>● Where there are allegations against a staff member, staff should contact the Principal</li> <li>● Complete records as appropriate</li> </ul>	All Staff <i>NB this does not just apply to those involved with teaching and learning.</i>
<b>Designated Safeguarding Officers (DSOs)</b>	<ul style="list-style-type: none"> <li>● To advise staff with safeguarding concerns</li> <li>● To deal with safeguarding issues and concerns in line with the procedures including liaising with external bodies e.g. Social Services</li> </ul>	Student Services
<b>Lead Safeguarding Officer (LSO)</b>	<ul style="list-style-type: none"> <li>● To manage safeguarding policies and procedures to ensure compliance with legislation and good practice.</li> <li>● To produce reports for SLT</li> </ul>	Head of Student Services

	<ul style="list-style-type: none"> <li>● <i>Where necessary</i> to advise DSOs on cases.</li> </ul>	
<b>Principals</b> (or if unavailable another SLT member)	<ul style="list-style-type: none"> <li>● To oversee the delivery of effective safeguarding</li> <li>● To be informed of all serious safeguarding matters by the Lead Safeguarding Officer</li> <li>● To receive and act on any allegations against a staff member or volunteer</li> </ul>	Principal (or if unavailable another SLT member)

#### **4 Our three Safeguarding Pathways: How we deal with safeguarding concerns**

##### **4.1 How safeguarding concerns can arise**

A *safeguarding concern* can arise in three different ways, from:

- a student's *disclosure*
- an *allegation* made by a student, staff member or anyone else, or
- a *suspicion* based on unconfirmed evidence or rumour.

Whilst safeguarding staff may handle these slightly differently, they all add up to a *concern* which must be reported *immediately*. Where there is any doubt about whether a concern should be raised, LMA requires the individual to contact the appropriate Safeguarding Officer.

***It is possible that safeguarding issues may emerge during disciplinary procedures and vice versa. It is vital that staff ensure that, where necessary, both safeguarding and disciplinary procedures are invoked to ensure comprehensive solutions are found.***

##### **4.2 Our three safeguarding pathways**

LMA uses three pathways to describe the reporting and management of concerns. *These pathways are illustrative*. So whichever pathway a concern is raised under is not as important as the fact that the concern is raised.

We have a zero tolerance of harm to students. So no matter which pathway adopted, students can be assured we will investigate concerns fully and sensitively.

- Pathway 1 is for safeguarding concerns arising from the actions of anyone **except** a staff member, governor, contractor or volunteer
- Pathway 2 is for safeguarding concerns about staff members, volunteers, etc. that are NOT related to actual or potential relationships between students and staff members
- Pathway 3 is for safeguarding concerns related to an alleged actual relationship between a staff member or student *or the potential for one to develop*.

The pathways are set out in Appendices 1-3 and further guidance is set out below.

If you are unsure about a safeguarding concern or which pathway to follow, you should discuss this *at the earliest opportunity* with a Designated Safeguarding Officer.

##### **4.3 Pathway 1 – Safeguarding concerns about the actions of non-staff**

This pathway applies to anyone who is NOT working for or on behalf of LMA.

**Whose actions may be harming a student ?      What sorts of harm ?**

Other students, applicants  
Family members  
Visitors  
Any other person **excluding** College staff

**Any type including**, physical, psychological, financial or sexual

- Advice on handling a student's disclosure or allegation is set out in Appendix 5
- The concern should be discussed with a Designated Safeguarding Officer as soon as possible
- A SEL form (see Appendix 6) need not necessarily be completed to start the discussion. However, the DSO will record that discussion took place and a SEL form may need to be completed.

#### **4.4 Pathway 2 – Safeguarding concerns about the actions of staff, volunteers or contractors but not involving actual or potential sexual activity**

***Any safeguarding concern relating to a staff member, volunteer etc. must be taken seriously.***

This pathway applies to anyone who is working for or on behalf of LMA.

##### **Whose actions may be harming a student ?**

Any member of LMA staff  
Contractors including consultants  
Volunteers

##### **What sorts of harm ?**

**Any type including**, physical, psychological, financial but **excluding** a potential or actual sexual relationship.  
(See Pathway 3a and 3b)

- If the concern *includes* any sexual activity that may have already occurred or is a possibility, then this should be reported immediately using Pathway 3a and 3b
- Any *other* form of actual or potential harm arising from a person working for or on behalf of LMA should be reported to a Designated Safeguarding Officer as soon as possible

#### **4.5 Pathway 3a and 3b – Safeguarding concerns about possible relationships between staff and students**

***Any safeguarding concern relating to a staff member, volunteer, etc. must be taken seriously.***

##### **Whose actions may be harming a student ?**

Any member of LMA staff  
Contractors including consultants  
Volunteers

##### **What sorts of harm ?**

Evidence or rumour of an *actual* sexual relationship  
The *potential* for a sexual relationship due to an evident attraction between a staff member or student or a currently unreciprocated attraction/infatuation.

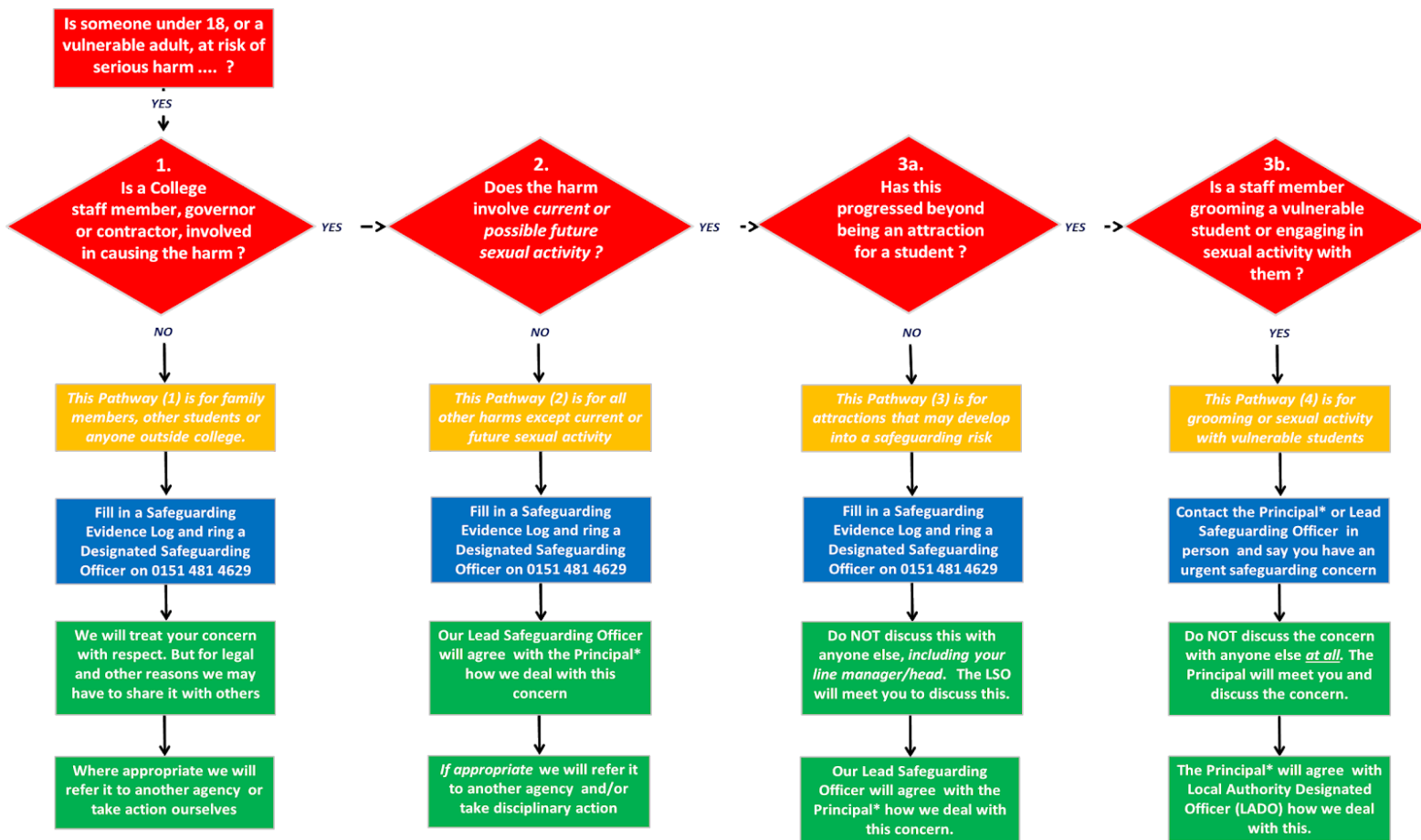
- Any safeguarding concern relating to actual sexual activity between a staff member and student, or grooming, must be reported **immediately, directly and confidentially to the Principal**
- Consent is NOT a justification where students are under 18 or vulnerable adults are involved
- The allegation must NOT be discussed with any staff or person outside LMA
- In the Principal's absence, another member of the SLT should be contacted
- Where an allegation is made in relation to the Principal, this should be referred to the Lead Safeguarding Officer

#### 4.6 Designated Safeguarding Officers

The Designated Safeguarding Officers are specially trained. They will discuss a concern with individuals, give advice on what to do next and, if necessary, how to record it. Appendix 4 sets out the broad approach the DSO will follow. Depending on the severity of the concern, the DSO will inform the Lead Safeguarding Officer *at the least* by email by the end of the working day. Where appropriate, the DSO will contact Social Services or other relevant agencies e.g. the NHS.

#### 4.7 The Lead Safeguarding Officer and Serious Safeguarding Issues

Where serious safeguarding issues emerge, the Lead Safeguarding Officer will inform the Principal and, if appropriate, the Designated Safeguarding Governor *within one working day*.



\* If the Principal is named in a concern, contact only the Lead Safeguarding Officer who will work with the Designated Safeguarding Governor.

For fuller details see Pathway 1

For fuller details see Pathway 2

For fuller details see Pathway 3

For fuller details see Pathway 3

## 5 **Good Practice: Confidentiality, Information Sharing and Managing Records**

LMA's Confidentiality and Disclosure Policy will provide full guidance. However, the following act as general principles.

### 5.1 **Priority to protect the individual**

*Where there are concerns that a child, young person or vulnerable adult is, or may be, at risk of significant harm, their needs must always come first. The priority must always be to protect the child, young person or vulnerable adult.*

### 5.2 **College staff cannot offer anyone absolute confidentiality over safeguarding concerns**

### 5.3 **Explaining to students the duty to follow College procedures**

Where a staff member is informed by a student of a safeguarding concern, i.e. a "disclosure" has occurred, the staff member should inform the student *as soon as possible* that they have a duty to follow College procedures and inform an appropriate person.

### 5.4 **Information may be shared only with Designated Safeguarding Officers, if:**

- *a young person or vulnerable adult (as defined in Section 1.3) has been harmed or is at risk of harm or of harming others*
- *an individual may present a risk to students, staff or volunteers*

### 5.5 **Obtaining advice if unsure about confidentiality**

If a member of staff is unsure who they can share confidential information with, they should discuss this with one of the Designated Safeguarding Officers specified in Section 3.

### 5.6 **Our Data Protection Act 1998/ GDPR 2016 obligations**

LMA lawfully keeps and processes information about staff, students and other parties. To comply with legislation and good practice, we expect personal information will be collected and used fairly, stored safely and not disclosed to any other person unlawfully. Further details about LMA's Data Protection Policy can be provided on request.

### 5.7 **Our approach to making records**

We will:

- *Keep clear, detailed, written records of safeguarding concerns (noting the date, event and action taken) **even where there is no need to refer the matter to other agencies***
- *Ensure all records are kept secure and in locked locations*

### 5.8 **Our Record Retention Policy**

We will keep safeguarding records as advised by the Information and Records Management Society's Records Management Toolkit for Schools. The current Version 4 (May 2012) outlines the schedule for record keeping in schools as follows:

<b>Basic File Description</b>	<b>Statutory Provisions</b>	<b>Retention Period</b>	<b>SECURE DISPOSAL required at the end of the administrative life of the record</b>
Child Protection Files, and Pupil Files	Education Act 2002, s175, related guidance, 'Safeguarding	Date of Birth + 25 years	For students who leave and are under 18 safeguarding information will be copied and sent under



	Children in Education' 2004	separate cover to new school/college
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## 5.9 Handling and Sharing of Images

The Procedure for the use, storage of photography and digital media Photography and recorded images of Students is an integral element of work undertaken within LMA's marketing, recruitment, widening participation and educational liaison remit. It is essential that the images are not inappropriately misused or adapted, therefore the following guidance has been issued:

- Written consent must be sought and obtained prior to any event. Students have the right to decline permission to have their pictures taken and how those images may be used.
- The nature and possible purpose of the images should be made explicit in the literature.
- Personal details should not accompany or be published alongside the image.
- students should be informed prior to any use of any easily identifiable image. If the young person is prominent in the image, they should be sent a proof for consultation. Personal details should not accompany or be published alongside the image.
- The legitimacy and potential risks in the use of images must be identified; this can be incorporated in the formal risk assessment undertaken when planning an event. The image should convey the best principles and aspects of the activity, focusing on the endeavour rather than the participants. Care needs to be taken about the presentation of the image, ensuring it is not open to misuse or misinterpretation.
- Students need a clear brief about what is considered appropriate, especially if they engage in taking pictures. Staff members need to be aware that photos can be exploitative and used in harassment and bullying.
- Images should be regarded as confidential information and stored accordingly, in line with LMA's policy; they should be deleted as soon as they are no longer required.

## 5.10 Personal Equipment Guidelines

LMA Safeguard our students by protecting personal data and any images that may be taken, as mentioned above.

The sixth Data Protection Principle states that; 'Appropriate security of the personal data, using appropriate technical or organisational measures (and, in this principle, "appropriate security" includes protection against unauthorised or unlawful processing and against accidental loss, destruction or damage)'. The LMA has no control over the security of home computers and laptops or indeed persons accessing them. There is always the possibility of the home being burgled and the computer being stolen, or, if the files are stored on diskette, CD or memory sticks that these are stolen or lost in transit. The same would apply to paper records (e.g. registers). Anyone who needs to take personal information off site is responsible for ensuring that:

- Any personal data, including images which they hold is kept securely.
- Personal information including imagery is not disclosed either orally or in writing or accidentally or otherwise to any unauthorised party.

Personal information and images should be:

- Kept in a locked filing cabinet: or
- In a locked draw: or
- If it is computerised, is password protected: or
- Kept only on encrypted portable media, which is itself kept securely.
- Disposed of safely and securely.

You should be aware that if you do not follow procedures and the Act is contravened you personally would be responsible and subject to disciplinary action and may be found to be committing an offence and you could be fined.

Mobile phones are not to be used for taking and storing of images. Only LMA cameras and equipment are to be used for taking of images.

### **5.11 Student Absence Tracking**

LMA have a care of duty to help to identify potential Safeguarding matters via unauthorised absences.

#### Dealing with poor attendance and absence issues

LMA will use a range of different approaches to establishing reasons for absence and will identify interventions that will enable the attendance to improve.

- Where a student has not notified of an absence, a member of Student Services will contact the student directly that morning/afternoon.
- Where a student's attendance remains below 90%, a meeting will be set up with the Head of Curriculum
- Student Services staff will provide targeted support to students with more serious attendance issues (where they fall below 70%) and will work intensively with individuals to deal with these issues
- Student Services will ensure that they maintain good working relationships with referral agencies who will be able to deal with issues affecting attendance which go beyond LMA's remit

#### Monitoring attendance and punctuality

- Attendance levels for individuals, at course level, at curriculum level and at institution level will be carefully monitored and action taken to address poor attendance at each of these levels
- Course Teams will monitor attendance and punctuality and agree action for improvement
- Heads of Curriculum will monitor attendance and punctuality on a weekly basis, conduct spot checks and take appropriate action to make improvements.
- The Senior Leadership Team will monitor attendance and punctuality on a weekly basis

## **6. Good Practice: Safer Recruitment of Staff and Volunteers**

We are committed to safeguarding and promoting the welfare of children and young people and expect all staff, sub-contractors and volunteers to share this commitment.

### **6.1 The HR Recruitment Procedure**

Our recruitment procedure is designed to assist managers to recruit and select the best candidates for a vacancy and takes account of all relevant legislation including the Keeping Children Safe in Education Guidance. The procedure will be updated as vetting and barring arrangements develop to ensure we not only meet our legal duties, but go beyond the minimum required for compliance whenever possible to further reduce the risk of harm

The key safeguarding-related points of this document are:

<b>Prior to interview</b>	All candidates are required to complete the LMA Application Form, including reasons for any gaps in employment
<b>Interview Stage</b>	<p>All candidates are required to complete and hand in a Disclosure and Barring Service (DBS) form prior to interview. Identity is checked at this stage and Right to Work in the UK documentation.</p> <p>In addition to assessing the applicant's suitability for the particular post, the interview panel will also ensure that the candidate understands the requirement for a DBS check and will explore:</p> <ul style="list-style-type: none"> <li>● The candidate's attitude towards children and young people</li> <li>● Gaps in employment history</li> </ul>
<b>Confirmation of offer</b>	<p>Verbal confirmation regarding the outcome of the interview will be communicated within 48 hours of interview and should the interview fall on a Friday, notification will be within 72 hours.</p> <ul style="list-style-type: none"> <li>● DBS Barred List checks (subject to role)</li> <li>● DBS application form sent to DBS</li> <li>● References requested from the successful candidate's referees</li> </ul> <p>All job offers will be conditional subject to obtaining two satisfactory references, a satisfactory DBS clearance, medical clearance, qualifications check, right to work check and a three, six, nine or twelve month probationary period depending upon whether it is a business support or lecturing position.</p>

## 6.2 Volunteers

For volunteers who have regular and unsupervised access to children and young people checks will be carried out consistent with the previous paragraph. Under the terms of the Protection of Freedoms Act 2012 where a volunteer is being adequately supervised, they are not considered to be working in regulated activity however often they do this, and LMA does not need to request a DBS check.

## 6.3 Notifying the Disclosure and Barring Service

The Disclosure and Barring Service will be informed immediately by Human Resources where a candidate is found to:

- be barred from working with children or adults
- have provided false information, on or in support of, his or her application or
- there are serious concerns about an applicant's suitability to work with children, young people or vulnerable adults.

## 7. Good Practice: Our commitment to working with other agencies

### 7.1 LMA's commitment to collaboration

LMA acknowledges its obligations to work with other agencies to ensure the wellbeing of members of the wider community. We recognise the particular role of Social Services and our Lead and Designated Safeguarding Officers will keep in regular communication with Social Services colleagues and consult on policy updates and good practice developments.

We will work to develop effective links with other services and agencies and co-operate as required with their enquiries regarding safeguarding matters. This includes attendance at case conferences, core groups, strategy meetings, review conferences and the submission of written reports where required.

## **8. Good Practice: Guidance on appropriate behaviours and ensuring safer situations**

This content in this section is based on the *Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings (DCSF 2009)*.

### **8.1 Appropriate behaviours**

The following guidance is intended both as a safeguard for students and a protection for staff from malicious accusations.

LMA considers the behaviours listed below to be inappropriate in the company of students. We take our duty of care to our students very seriously and expect our staff, volunteers and contractors to respect that duty and not undermine our reputation as well as their own.

We do appreciate there are some circumstances where good sense dictates exceptions need to be made, for example where greater risk of harm may arise if an exception is not made. *However, these circumstances should be rare.* Where a staff member or volunteer has made an exception to any one of these behaviours, they should notify their line manager in writing by the end of the next working day, naming the students, describing the circumstances and indicating the reasons why they felt it appropriate to make an exception to this guidance. The line manager will reply in writing indicating whether the exception was in this occasion acceptable, may provide advice or take further action, including following one of the three pathways listed in Section 4.

The inappropriate behaviours include:

- *Drinking alcohol, taking “legal highs” or illegal substances with students*
- *Any illegal activity with a student*
- *Having any form of sexual relationship with a student*
- *Accepting money or gifts from a student (except small tokens of appreciation)*
- *Lending money or giving valuable gifts to a student*
- *Giving a student a lift home (except where a greater risk may occur by not doing this)*
- *Taking a student to your home/going to a student’s home/or other domestic setting*
- *Arranging to meet a student outside of work hours or on non-college business*
- *Telling a student your home address, home telephone number, or mobile number*
- *Inappropriate physical contact (unless a necessary part of professional activity e.g. the Positive Handling (Restraint) policy)*
- *Discussing a student with another member of staff other than your line manager or other staff who have direct responsibility for that student, without their consent*
- *Communicating any information about a student in any way*
- *Storing or disposing of student data in an unsecured manner e.g. unshredded in a bin*
- *Taking responsibility for a student’s personal property*
- *Wearing offensive, revealing or provocative clothing*
- *Visually intrusive behaviour and entering changing rooms without announcing first*
- *Entering into or encouraging unjustified or inappropriate discussion of sexual activity*

## 8.2 Creating safer situations

The following examples provide *broad* advice on situations where safeguarding questions often arise. Professional judgement should always be used to ensure student welfare. In all activities with students, the following principles will apply.

- *Ensuring the welfare of the student is paramount*
- *Conducting a full and appropriate risk assessment, well in advance and keeping it updated*
- *Ensuring that behaviour remains professional at all times*
- *Reporting any exceptions or concerns to a senior manager (usually the Department Head)*

### Transporting students

- *Designate a staff member to plan and oversee all transporting arrangements*
- *Do not use private vehicles to transport students*
- **Always** *have at least one adult in addition to the driver to act as an escort.*
- *Do not offer lifts to students outside their normal working duties, unless otherwise agreed with your line manager and parents/carers.*
- *In an emergency situation (or where not to give a lift places a student at risk), the lift must always be recorded and reported to the line manager and if appropriate parents/carers.*

### Educational Visits and Out of Hours Activities

- *Always have another adult present in out of workplace activities (unless otherwise agreed with a senior manager)*
- *Ensure full and appropriate risk assessments have been agreed*
- *Always obtain parental consent for the activity*
- *Never share a bed with a student and do not share bedrooms (unless in a dormitory unless arrangements have been previously agreed by a senior manager, parents and students)*

### Communicating with students and use of social media (see also College Acceptable Use Policy)

- *Only contact students for professional reasons and use college-supplied equipment to do it*
- *Ensure that **all** communications are transparent and open to scrutiny*
- *Personal social media sites should be set at private and students not accepted as contacts*
- *Never use or access students' social networking sites*

### Photography and Videos

- *Images of students should only be obtained for college purposes on college equipment*
- *If an image is used avoid naming the student (unless relevant for a media release)*
- *Images should be securely stored and used only by those authorised to do so*

### Home visits

- *Agree the purpose for any home visit with Managers in advance*
- *Adhere to the Home Visit Policy*
- *Always make detailed records including times of arrival and departure and work undertaken*
- *Ensure any behaviour or situation which gives rise to concern is discussed asap*
- *Never make a home visit outside agreed working arrangements*
- *Where informally dropping off e.g. Work or books do not enter the home.*

### One to one working, invigilation etc.

- *Avoid meetings in remote, secluded or closed areas*
- *Always inform colleagues and/or parents/carers in advance*
- *Avoid use of 'engaged' (or equivalent) signs wherever possible.*

- *Always report afterwards, and especially when a student becomes distressed or angry.*

*All LMA staff shall undertake safeguarding and anti-radicalisation awareness training upon commencement of their employment. This will be refreshed every 12 months.*

## **APPENDICES**

**Appendix 1 – Pathway 1 for Safeguarding concerns about the actions of non-staff**

**Appendix 2 – Pathway 2 for Safeguarding concerns about the actions of staff members**

**Appendix 3 – Pathway 3 for Safeguarding concerns about possible staff/student relationships**

**Appendix 4 – Example of an approach a Designated Safeguarding Officer might take**

**Appendix 5 – Advice for dealing with a student’s safeguarding concern**

**Appendix 6 – Safeguarding Evidence Log (SEL)**

**Appendix 7 – Examples of Abuse or Harm**

**Appendix 8 – Signs and Symptoms of Harm and Abuse**

**Appendix 9 – Factors to help identify vulnerability to radicalisation**

**Appendix 10 – List of Relevant Policies and Resources**

**Appendix 11 – Abbreviations commonly used in safeguarding literature**

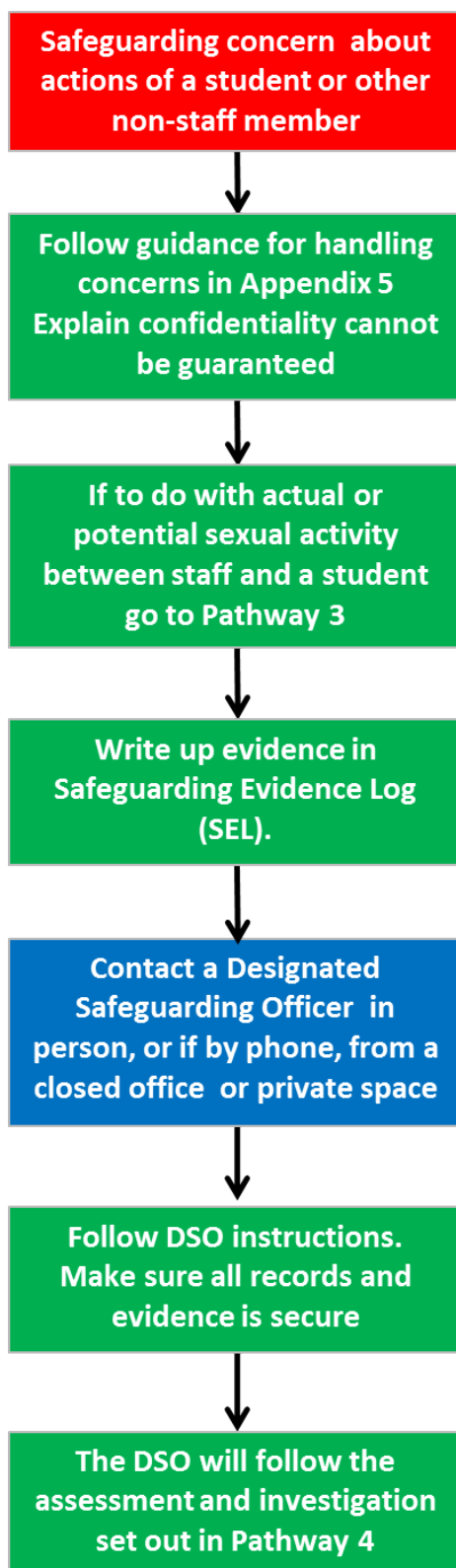
**Appendix 12 – Key Contact Numbers**

## **PATHWAY 1 – Dealing with safeguarding concerns about the actions of *non-staff***

Staff members are deemed to include governors, volunteers, contractors, etc.

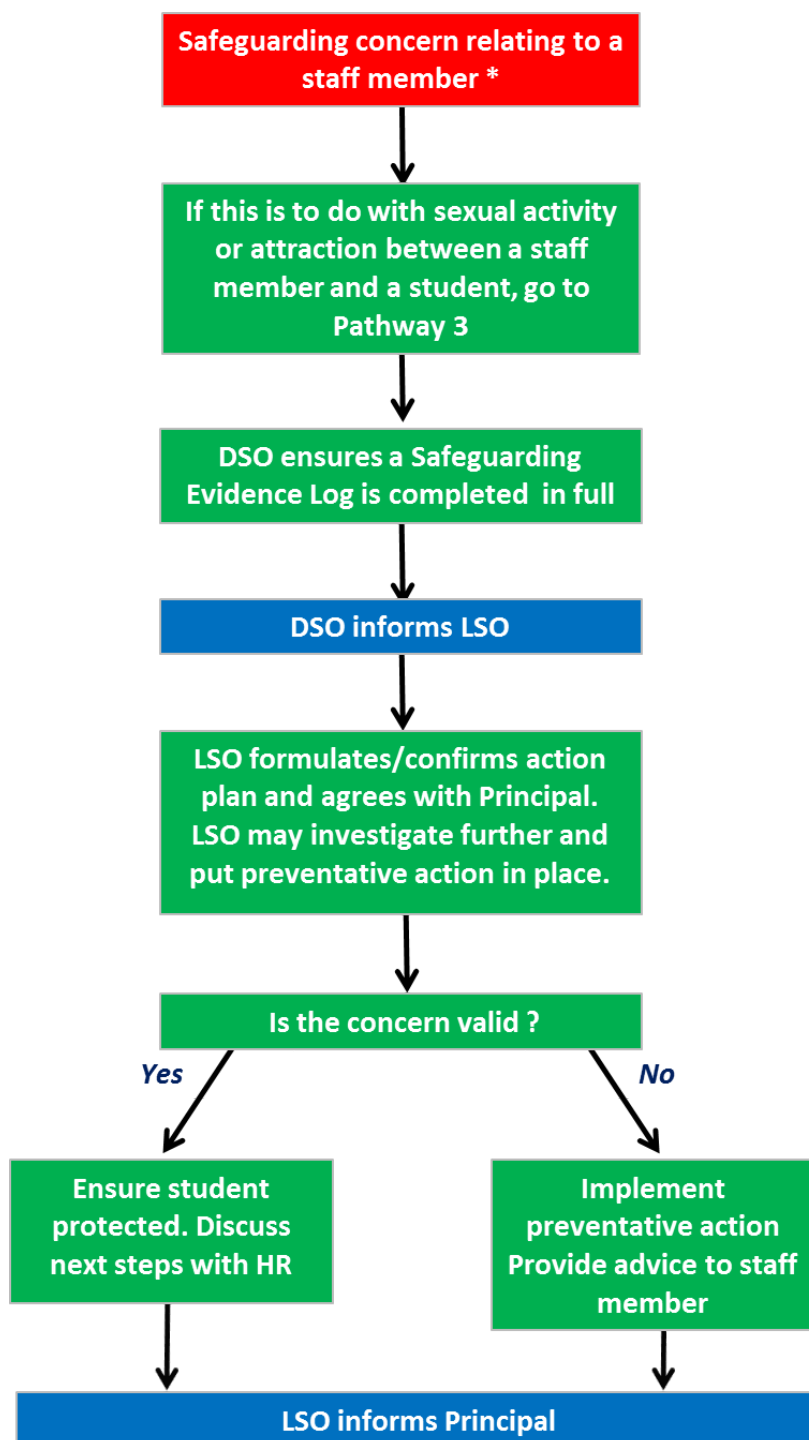
***The welfare of the child or vulnerable adult must be paramount in all you do***

*In an emergency (e.g. where there is the risk or evidence of severe harm), where immediate action is needed to safeguard the health or safety of any individual, the emergency services must be contacted.*



**PATHWAY 2 – Dealing with concerns about the actions of College *staff members***

*Staff members are deemed to include governing body members, volunteers, contractors, etc.*



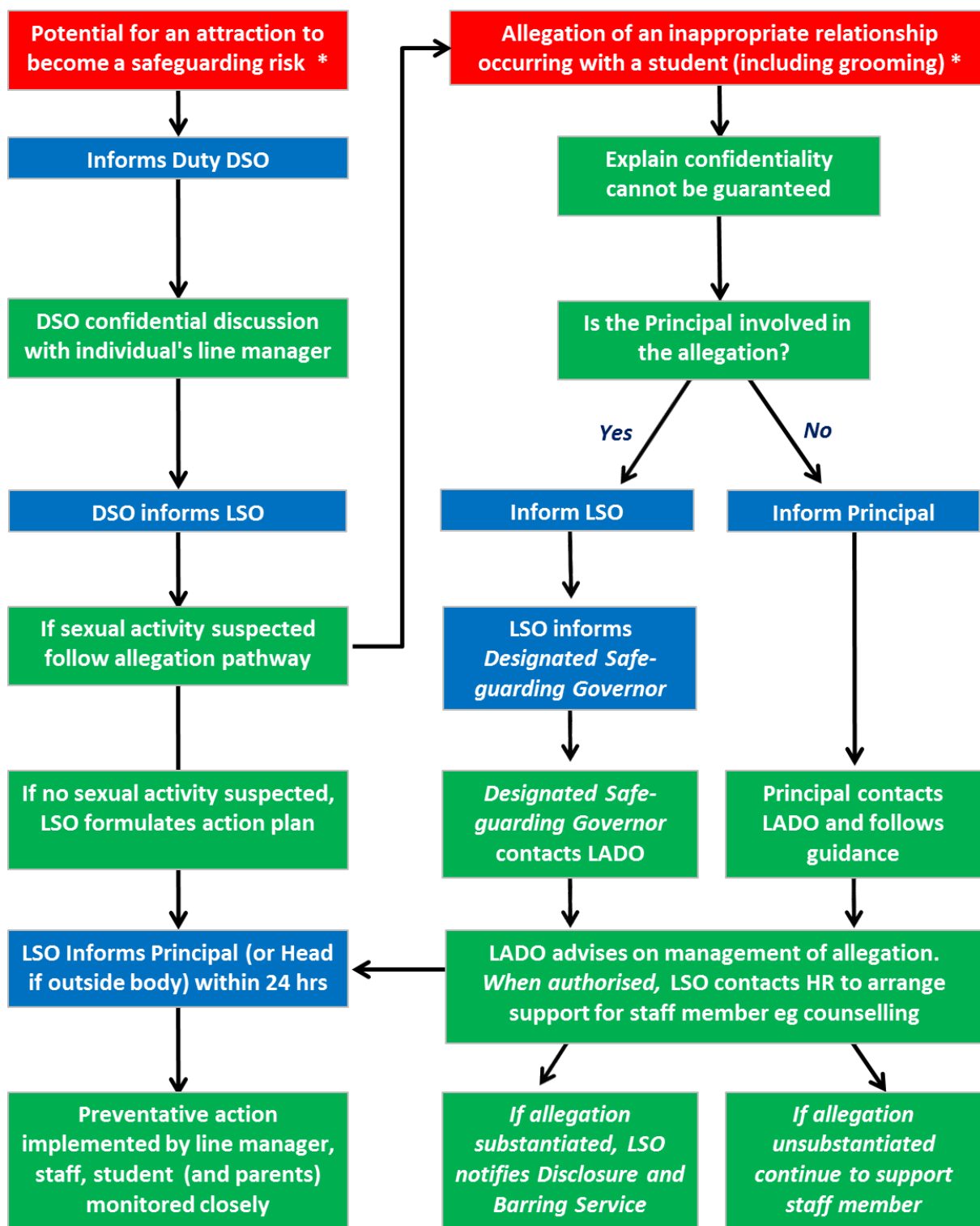
*\*If Principal involved see Paragraph 4.5 and only contact Lead Safeguarding Officer*



**(Counselling for staff and informing parents/carers will take place when appropriate).**

Pathway 3a and 3b for Safeguarding concerns about possible Staff/Student relationships

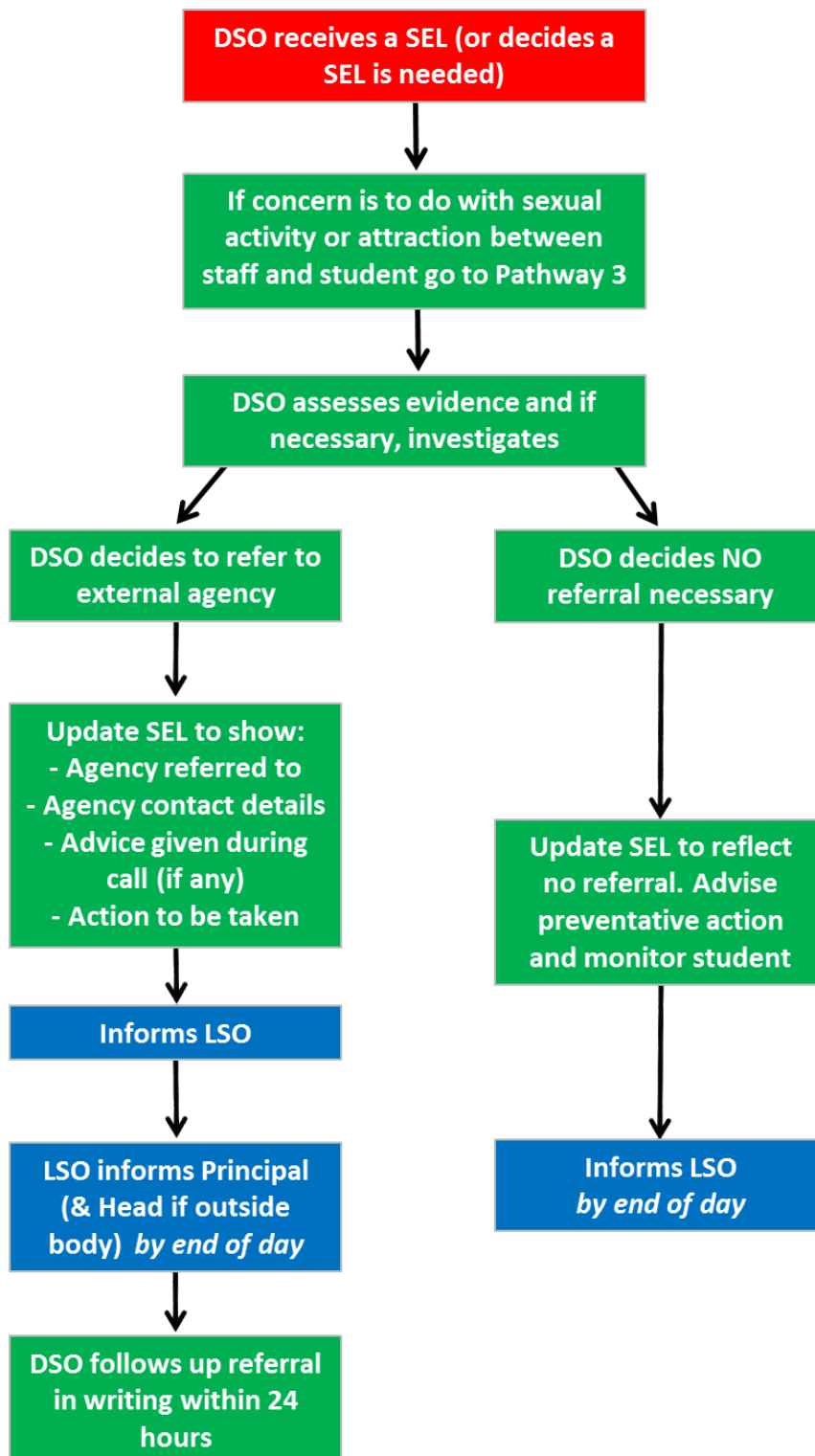
*Staff members are deemed to include volunteers, contractors, governing body members, etc.*



*\*If Principal involved see Paragraph 4.5 and contact Lead Safeguarding Officer*

**(Counselling for staff and informing parents/carers will take place when appropriate)**

APPENDIX 4 –Example of approach a Designated Safeguarding Officer might take



## APPENDIX 5 – Advice for dealing with a student’s safeguarding concern

### 1. Guiding principles

Dealing with safeguarding issues may seem daunting. However, it is essential that we all recognise we all have a big responsibility to ensure the welfare of our students. The following sets out some advice to help you when dealing with a suspicion, an allegation or a disclosure from a student. We cannot give you advice that will cover every situation and we expect you may well have to use your professional judgement to get the best outcome for a student. However, the following principles are good guides when you may be unsure what to.

- *Student safety and wellbeing are your most important objective*
- *Students must feel their safeguarding concerns will be heard sympathetically*
- *If there is a credible and immediate danger of serious harm, you must act to protect students e.g. call an ambulance*
- *Where the harm is not immediate, do not take any action and inform a Designated Safeguarding Officer immediately*
- *If you are unsure about anything, speak with a Designated Safeguarding Officer*

### 2. Handling a safeguarding discussion

Discussions about safeguarding are often not planned. However, you must always ensure the individual understands that LMA is committed to dealing with safeguarding concerns. During the discussion it will be important to achieve as much as possible of the following.

1. Find a suitable place in College where the student will feel comfortable to speak to you.
2. Explain at the earliest opportunity that it may not be able to offer complete confidentiality. Explain who you may have to tell and why.
3. Listen carefully to what the student says, asking the student to clarify anything you do not understand.
4. If the victim, reassure the student they have not done anything wrong and it is not their fault
5. Do NOT ask leading questions (e.g. *Did your mother do this to you?*)
6. Do NOT press the student for any more information than they are willing to give
7. Do NOT make promises (e.g. *this will never happen again*)
8. Record these facts accurately on the SEL. If a SEL is not immediately to hand, record the details ensuring that the following as a minimum is recorded:
  - *your name*
  - *student’s full name*
  - *student’s address*
  - *student’s date of birth*
  - *name and telephone number of parent/carer with legal responsibility for the student*
  - *details of the concern(s) and the sources of supporting evidence*
9. Transfer all the information on to a SEL as soon as you are able to and keep it secure
10. Contact the Designated Safeguarding Officer immediately to deal with the concern.
11. Do NOT email or send the SEL in the post without first speaking to the Safeguarding Officer
12. Mark as PRIVATE AND CONFIDENTIAL when sending SEL through internal mail. If sending an email containing this information, keep sensitive/personal details to a minimum i.e. refer to the student’s initials rather than their full name.
13. Continue to monitor and provide support to the student whilst awaiting further instructions
14. Subject to discussion with the DSO, keep the student fully informed about what you are doing and what is happening throughout the process

**Appendix 6 Safeguarding Evidence Log**

**Safeguarding: Record of meeting**

<b>Student name</b>	
<b>Student tele number</b>	
<b>Parent tele number</b>	
<b>Course</b>	
<b>Date of birth</b>	
<b>Does the student have a disability or any protected characteristics?</b>	
<b>Date and time of meeting</b>	
<b>Staff present</b>	
<b>Are any external agencies involved?</b>	

<b>What harm has, or may, happen?</b>
<b>Who is causing the harm?</b>
<b>Where does, or might, the harm take place?</b>
<b>When did, or might, the harm take place?</b>
<b>Has this concern been previously raised?</b>
<b>Are there any reasons to believe the harm is likely to occur, or be repeated, in the next twelve hours?</b>

**Does any action need to be immediately taken to safeguard the individual from harm?**

**Additional notes:**

**Signature of chair of meeting:**

## Appendix 7 – Examples of Harm which would be Safeguarding Concerns

Abuse is a violation of a person’s human rights. The abuse may consist of a single act or repeated acts. It may be physical, verbal or psychological. It may be an action, neglect or failure to act. It may be persuading a vulnerable person into a financial or sexual transaction where consent could not be obtained or was inappropriately obtained. Abuse can happen in any relationship and result in significant harm to, or exploitation of, the person subjected to it.

For greater details about abuse and how to spot it, visit the NSPCC and NHS Choices webpages.

<b>Harm Category</b>	<b>Examples</b>
<b>Physical Abuse</b>	This may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, using unnecessary physical force, misuse of medication, restraint or inappropriate sanctions or otherwise causing physical harm. The abuse may be deliberate or unintentional. This abuse also includes Female Genital Mutilation (FGM), forced marriages and honour based violence.
<b>Psychological or Emotional Abuse</b>	This includes persistent psychological or emotional ill treatment. It may involve conveying individuals are worthless or unloved, inadequate, or valued only where they meet another person’s needs. It may involve frequently causing individuals to feel frightened or in danger, threatening or causing harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, withdrawal from services or supportive networks. Psychological abuse is often present in most other forms.
<b>Sexual Abuse including sexting</b>	Forcing or enticing a young person to take part in sexual activities to which the individual could not consent to, <i>or was pressured into</i> consenting. These can be penetrative or non-penetrative acts, or non-contact activities, e.g. on-line activities like sexting, or involving children in watching pornographic material or sexual activities, or encouraging children to behave in sexually inappropriate ways. Sexual abuse can occur between people of the same sex and it can also occur within a marriage or any relationship of any length.
<b>Child Sexual Exploitation</b>	Sexual exploitation of young people under 18 involves exploitative situations where a young person (or a third person or persons) receives ‘something’ e.g. food, accommodation, drugs, alcohol, cigarettes, affection, gifts or money, as a result of performing and/or others performing on them, sexual activities. Child sexual exploitation can occur through the use of technology without the young person’s recognition, for example, being persuaded to post sexual images on sexual media. In all cases, those exploiting the young person have power over them by virtue of their age, gender, intellect, physical strength and/or economic gain. Violence, coercion and intimidation are common in exploitative relationships being characterised in the main by the young person’s limited availability of choice resulting from their social, economic and/or emotional vulnerability.
<b>Self-Neglect</b>	This is not a direct form of abuse. However, staff need to be aware we may owe a duty of care to an individual who places him/herself at risk e.g. through risky behaviours, drug or alcohol misuse, unsafe sexual activity.

<b>Neglect and Acts of Omission</b>	<p>Neglect is the <i>persistent</i> failure to meet basic physical and psychological needs. It can be the result of deliberately withholding things from an individual or not providing them when needed. It may involve a parent or carer failing to ensure an individual gets:</p> <ul style="list-style-type: none"> <li>- adequate food, shelter and clothing,</li> <li>- protection from physical harm or danger, especially when someone cannot properly assess risks or deal with challenging situations</li> <li>- access to appropriate medical care or treatment,</li> <li>- the help or support he/she needs to carry out the activities for daily living</li> <li>- reasonable emotional support.</li> </ul>
<b>Bullying including Cyber Abuse</b>	<p>Cyber abuse is any form of abuse which takes place (through texts, messaging or photo sharing) via computers or mobile phones. Most of the harms listed below can either occur directly, or indirectly through vulnerable individuals being persuaded into harmful behaviour. Cyber abuse involves anything that causes someone to feel uncomfortable or upset and includes threats, abusive comments, embarrassing or nasty pictures, rumours or gossip, stolen identity and blackmail. Sex abuse, grooming, financial exploitation and radicalisation can also take place on the internet.</p>
<b>Radicalisation</b>	<p>Radicalisation involves individuals or groups of people being drawn into extremism and terrorism either by supporting terrorist related activity or by becoming terrorists. This relates to all forms of terrorism such as international terrorism, significantly Al Qa'ida affiliated, far right extremist ideology and other forms of terrorism. It also includes students being persuaded to leave UK to participate as soldiers or support workers in foreign wars e.g. Syria.</p>
<b>Discriminatory and Faith Abuse</b>	<p>This involves abuse, bullying and harassment relating to the individual's age, gender, disability, religion, race or ethnicity or sexual orientation. Recognised signs may be very similar to psychological and emotional abuse. Abuse that is targeted at a person because of hostility or prejudice towards a person's disability, race or ethnicity, religion or belief, sexual orientation or transgender identity is a Hate Crime.</p>
<b>Financial or Material Abuse</b>	<p>This may include theft, fraud, exploitation or pressure in connection over financial transactions. This also includes the inappropriate use, misuse or misappropriation of property, possessions or benefits.</p>
<b>Domestic Violence</b>	<p>This is a single or more incidents of controlling, threatening, forcing behaviour towards an intimate partner or a family member who is 16 or over and regardless of their gender or sexuality.</p>
<b>Teenage relationship abuse</b>	<p>This is where a young person abuses the person who they are or was in a relationship with. The abuse can be physical, emotional or sexual, including rape. The most commonly reported emotional abuse, irrespective of gender, was being made fun of or constantly being checked up on. Risk factors can include previous experiences of parental domestic violence, physical and sexual abuse and violent peer groups.</p>
<b>Drug abuse</b>	<p>Drug or substance abuse is a patterned use of illegal drugs, such as cannabis, or those known as 'legal highs,' which an individual consumes and in amounts or methods which are harmful to themselves or others.</p>
<b>Gangs and Youth Violence</b>	<p>Trafficking means the recruitment, transportation, transfer, harbouring or receipt of persons for exploitation. This is most often for sexual purposes, but it can extend to forced labour, slavery or the removal of organs. Trafficking is usually achieved through the threat or use of force, abduction, fraud or deception, payment or abuse of positions of power.</p>



<b>FGM</b>	Female genital mutilation (FGM) involves procedures including partial or total removal of the external female genitalia or other injury to the female genital organs for non-medical reasons. It is illegal to perform in the UK or to take anyone out of the country for it to occur. FGM is a deeply rooted tradition, widely practised mainly among specific ethnic populations in Africa and parts of the Middle East and Asia. It often occurs to primary school age girls.
<b>Forced marriage</b>	A forced marriage is where one or both individuals do not (or in cases of people with learning disabilities, cannot) consent to the marriage. It can be achieved for example through emotional or psychological abuse (bringing shame on the family), threats of violence or other forms of coercion like financial abuse. Since 2014 it is illegal to conduct in the UK or transport someone out of the country for this purpose. It is regarded as a form of violence against women and men, domestic/child abuse and a serious abuse of human rights. Often, the victim is persuaded to leave the UK and signs may include one way air tickets.
<b>Trafficking</b>	Trafficking means the recruitment, transportation, transfer, harbouring or receipt of persons for exploitation. This is most often for sexual purposes, but it can extend to forced labour, slavery or the removal of organs. Trafficking is usually achieved through the threat or use of force, abduction, fraud or deception, payment or abuse of positions of power.

## **APPENDIX 8 – Signs and Symptoms of Harm and Abuse**

There is no exhaustive list of the signs to indicate that a student is being harmed or abused and signs may not always be evident. However, we should look out for the sorts of behaviours listed below, taking appropriate action if we become aware of them. This may be to have a chat with the student; speak to the student's Personal Tutor; or if speak to a DSO.

Signs and symptoms to look out for are: (Keeping Children Safe in Education, April 2014)

*Changes in behaviour*

*A decline in academic performance*

*Absence from college*

*Poor physical appearance including poor personal hygiene*

*Distress and tearfulness*

*Physical injuries such as unexplained bruises or fractures*

*Nervousness, anxiety, depression*

*Becoming isolated and withdrawn – having few or no friends*

*Fear of someone or others*

*Aggression and the inability to control emotions*

*Constant tiredness*

*Eating disorder*

*Risk taking*

*Repeatedly having no money for lunch*

*Obsessive behaviour*

*Drug taking*

*Alcohol abuse*

*Self-harm*

*Untreated medical conditions*

*Promiscuous behaviour*

*Pregnancy*

*Suicidal thoughts*

## **APPENDIX 9 - Factors to help identify vulnerability to radicalisation**

It is important for all College staff to be aware of the signs or indicators of the radicalisation process to prevent students from being drawn into terrorist activity. The Government's vulnerability framework, outlined in Channel (see link below) is comprised of three categories:

- **Engagement** with a group, cause or ideology
- **Intent** to cause harm
- **Capability** to cause harm

Categories must be considered separately as well as together because not all have to be present. Also, the list of indicators in each category is neither exhaustive nor will they necessarily lead to individuals becoming terrorists.

**1. Engagement with a group, cause or ideology:** Example indicators that an individual is **engaged** with an extremist group, cause or ideology **include:**

- a. *spending increasing time in the company of other suspected extremists*
- b. *changing their style of dress or personal appearance to accord with the group*
- c. *their behaviour becoming increasingly centred around an extremist ideology, group or cause*
- d. *loss of interest in friends & activities not associated with the extremist ideology, group or cause*
- e. *possession of material or symbols associated with an extremist cause (e.g. the swastika for far right groups)*
- f. *attempts to recruit others to the group/cause/ideology*
- g. *communications with others that suggest identification with a group/cause/ideology*

**2. Intent to cause harm:** Example indicators that an individual has an **intention** to use violence or other illegal means **include:**

- a. *clearly identifying another group as threatening what they stand for and blaming that group for all social or political ills*
- b. *using insulting or derogatory names or labels for another group*
- c. *speaking about the imminence of harm from the other group and the importance of action now*
- d. *expressing attitudes that justify offending on behalf of the group, cause or ideology*
- e. *condoning or supporting violence or harm towards others*
- f. *plotting or conspiring with others.*

**3. Capability to cause harm :** Example indicators that an individual is capable of contributing directly or indirectly to an act of terrorism include:

- a. *having a history of violence;*
- b. *being criminally versatile and using criminal networks to support extremist goals;*
- c. *having occupational skills that can enable acts of terrorism (such as construction)*
- d. *having technical expertise that can be deployed (e.g. IT skills, knowledge of chemicals, military training or survival skills).*

**Remember:** Always maintain an **'It could happen here'** attitude to all aspects of harm.

If you are concerned about any student, always tell a Designated Safeguarding Officer and complete a Safeguarding Evidence Log, available on the Intranet.

More information can be found at <https://www.gov.uk/government/publications/channel-guidance>

## **APPENDIX 10 - List of Relevant Policies and Resources**

### **1. Other relevant policies**

Staff should also be aware of LMA's:

*Student Disciplinary Procedure*  
*Acceptable IT Use Policy*  
*Code of Ethics and Practice for Staff*  
*Confidentiality and Disclosure Policy*  
*Data Protection Policy*  
*Health and Safety Policy*  
*Positive Handling (Restraint) Policy*  
*Powers of search, screening and confiscation*  
*Staff Whistleblowing Procedure*  
*Student Anti-Bullying Policy*

### **2. Sources**

Every effort has been made for the policy and procedures outlined in this document to accord with the following legislation and guidance:

- Children Act (1989 and 2004)
- Working Together to Safeguard Children (DCSF, 2010)
- Keeping Children Safe in Education (2014)
- Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings (DCSF 2009)
- 'What to do if you're worried a child is being abused' (DfES, 2006)
- Safer Practice, Safer Learning (DfES, 2007)
- No Secrets (DH, 2000)
- No Silence, No Secrets (LMA Adult Protection Policy and Procedures V3)
- Safeguarding Vulnerable Groups Act (2006)

Key information sources include:

- NSPCC website – [www.nspcc.org.uk](http://www.nspcc.org.uk)
- The Centre for Excellence and Outcomes in Children and Young People's Services – [www.c4eo.org.uk](http://www.c4eo.org.uk)
- Action for Children – [www.actionforchildren.org.uk](http://www.actionforchildren.org.uk)
- Partner violence and sexual abuse – [www.nhs.uk/livewell/abuse/Pages/violence-and-sexual-assault.aspx](http://www.nhs.uk/livewell/abuse/Pages/violence-and-sexual-assault.aspx)

- Vulnerable adult abuse –  
[www.nhs.uk/carersdirect/guide/vulnerable-people/Pages/vulnerable-adults.aspx](http://www.nhs.uk/carersdirect/guide/vulnerable-people/Pages/vulnerable-adults.aspx)

## **APPENDIX 11 –Abbreviations commonly used in safeguarding literature**

<b>CAF</b>	Common Assessment Framework (for multi agency working on safeguarding cases)
<b>DBS</b>	Disclosure and Barring Service (replaced the CRB and ISA)
<b>DCSF</b>	Department for Children, Schools and Families (replaced by DfE)
<b>DfE</b>	Department for Education
<b>DfES</b>	Department for Education and Skills (replaced by DCSF)
<b>DoH</b>	Department of Health
<b>DSO</b>	Designated Safeguarding Officer
<b>KSAB</b>	LMA Safeguarding Adults Board
<b>KSCB</b>	LMA Safeguarding Children Board
<b>LADO</b>	Local Authority Designated Officer (who provides advice on safeguarding)
<b>LSO</b>	Lead Safeguarding Officer
<b>NSPCC</b>	National Society for the Prevention of Cruelty to Children

## APPENDIX 12 – Key Contact Numbers for Safeguarding Advice and Support

<b>Child and Adult Protection</b>		
	<b>Office Hours</b>	<b>Out of Hours</b>
Social Care Access Team	0151 443 2600	0151 443 2600
LADO	0151 443 5696	
Liverpool Child Careline	0151 233 3700	0151 233 3700
Halton Children's Social Care	0151 907 8305	0345 050 0148
St Helens Social Adult and Children Care	01744 676600	01744 676600
Sefton Plus (Adults and Children)	0845 140 0845	0845 140 0845
NSPCC	0808 800 5000	0808 800 5000
<b>Crime</b>		
Merseyside Police (24 hours)	0151 709 6010	
Victim Support	08081689111	
Stop Hate Crime UK	0800 1381625	
YOS	0151 443 3079	
<b>Domestic Violence/Forced Marriage/Rape/ Sexual Assault</b>		
National Domestic Violence Helpline	0808 2000 247	
Domestic Violence Support	0151 548 3333	
Forced Marriage Unit	0207 008 0151	0207 008 0151
Forced Marriage Helpline - Karma Nirvana	0800 5999 247	
RASASC (Rape and Sexual Abuse Centres)	LMA and St Helens 0151 666 1392 General	Helpline 01260 697900
RASA	Liverpool 0151 650 0155	
Safe place - Sexual Assault Referral Centre	0151 295 3550	
<b>Health &amp; Sexual Health</b>		
THinK Clinic	0151 244 3580	
Brook Clinic	0151 207 4000	
NHS 111	111	
<b>Mental Health</b>		
CAMHS (Child Adolescent Mental Health)	LMA and St Helens 0151 489 6137	
Liverpool Young Person's Advisory Service	0151 707 1025	
IAPT (Depression/Anxiety) with a LMA GP	0151 430 1707	
Childline 24 hrs Listening service under 18	08001111	0800 1111
Samaritans 24 hrs Listening service 18+	084579090	084579090
Hope Line 10 a.m. – 10 p.m. Practical advice and support for anyone aged 35 or under and who has suicidal thoughts	0800 068 4141 Text: 07786209697 Email: <a href="mailto:pat@papyrus-uk.org">pat@papyrus-uk.org</a>	
<b>Housing</b>		
Homeless Team	0151 207 7617	
Liverpool Homeless Service (Careline)	0800 731 6844	
SHAP (St Helens/Liverpool)	01744 454056	

Supported Lodgings

0151 4433895  
Liverpool 0151 4822469

Sefton 0151 285 4068

#### **Drugs & Alcohol**

Young We are with you	01928 240 406
Alcoholics Anonymous	0845 769 7555
Al-Anon (Support for family and friends)	0207 403 0888
Talk to Frank	0800 776600
Liverpool Young Person's Advisory Service	0151 707 1025

#### **Lesbian, Gay, Bisexual & Transgender**

Liverpool Young Person's Advisory Service	0151 707 1025
Armistead	0151 247 6560

#### **Other Advice Agencies**

Citizens Advice Bureau	0845 122 1300
Refugee Action	0808 800 0630
Muslim Youth Helpline	0808 808 2008

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