

Safeguarding Policy and Procedures for Children and Vulnerable Adults

Introduction

The London Institute of Banking & Finance is committed to safeguarding the welfare of:

- Children who come into contact with HE activities.
- Vulnerable adults who come into contact with HE activities, including any current learners at risk of harm.

We do this by creating a culture of vigilance. Where we have a duty of care, all individuals have the right to equal protection from all types of harm or abuse regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or gender identity. This policy covers all HE students and learners at The London Institute of Banking & Finance, including on-campus programmes, apprenticeship programmes, online programmes, and blended programmes. This policy applies to all students and learners regardless of whether they are in contact with us on campus, online, or a mix of both.

All staff at The London Institute of Banking & Finance that makes provision for children and vulnerable adults must ensure that:

- The welfare of the child / vulnerable adult is paramount.
- All children / vulnerable adults have the right to protection from abuse.
- All suspicions or allegations of abuse will be treated seriously and responded to appropriately.

All persons working on events have a responsibility to report concerns to the Designated Safeguarding Lead (DSL) or Deputy Safeguarding Officer (DSO).

Contact Details

Role	Name	Position	Email Address
Designated Safeguarding Lead (DSL)	Hema Tank	Managing Director	htank@libf.ac.uk
Deputy Safeguarding Officer (DSO)	Karen Taylor	Head of Apprenticeships	ktaylor@libf.ac.uk
Deputy Safeguarding Officer (DSO)	Hayley Cooper	Apprenticeship Programmes Manager	hcooper@libf.ac.uk
Deputy Safeguarding Officer (DSO)	Freddie McCann	Recruitment and Admissions Manager	fmccann@libf.ac.uk

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Deputy Safeguarding Officer (DSO)	Tom Wenham-Jones	Recruitment and Admissions Officer	twenham-jones@libf.ac.uk
Deputy Safeguarding Officer (DSO)	Emily Downes	Manager, Library Services	edownes@libf.ac.uk

This policy forms part of our Mental Health Strategy that encompasses a range of policies/guidance including our Suicide Safer Plan. In addition, the following documents are relevant and important to our safeguarding measures:

- Harassment & Sexual Misconduct Policy
- Equality & Diversity Policy
- IT Acceptable Use Policy
- Prevent Duty Guidance

Policy Statement

All staff, including Outreach Ambassadors, has a duty of care to safeguard children and vulnerable adults from all harm who are involved in activities and events that The London Institute of Banking and Finance organises or delivers. For the purposes of this Policy, the term “child” or “children” refers to a person or persons under the age of 18 years (as defined by the Children Act 2004). “The core definition of ‘vulnerable adult’ is a person who is or may be in need of community care services by reason of disability, age or illness; and is or may be unable to take care of him or herself or unable to protect him or herself against significant harm or exploitation” (from the 1997 Consultation “Who Decides?” issued by the Lord Chancellor’s Department). The London Institute of Banking and Finance Ltd adheres to the Keeping Children Safe in Education (KCSiE) Act 2018 which defines the legal duties that all staff in education must follow to safeguard and promote the welfare of children and young people aged under 18 years in schools and colleges.

For the purposes of this Policy, a child or vulnerable adult is considered to be abused when subjected to one or more of the following forms of abuse (based on the NSPCC’s definitions):

Domestic abuse: This is any type of controlling, bullying, threatening or violent behaviour between people in a relationship. It can seriously harm children and vulnerable adults.

Sexual abuse: This is when a child / vulnerable adult is forced or tricked into sexual activities. This doesn't have to be physical contact, and it can happen online.

Neglect: This is the ongoing failure to meet a child's / vulnerable adult’s basic needs and the most common form of abuse. A child / vulnerable adult might be left hungry or dirty, or without proper clothing, shelter, supervision or health care.

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This can be dangerous and also have long term effects on their physical and mental wellbeing.

Online abuse: This is any type of abuse that happens on the internet. It can happen across any device that's connected to the web, like computers, tablets and mobile phones.

Physical abuse: This is when someone hurts or harms a child or vulnerable adult on purpose, causing injuries such as bruises, broken bones, burns or cuts.

Emotional abuse: This is any type of abuse that involves the continual emotional mistreatment of a child / vulnerable adult. It's sometimes called psychological abuse. Emotional abuse can involve deliberately trying to scare, humiliate, isolate or ignore a child / vulnerable adult.

Child / vulnerable adult sexual exploitation: Is when a child / vulnerable adult is given things, like gifts, drugs, money, status and affection, in exchange for performing sexual activities.

Criminal exploitation & gangs: Criminal exploitation is abuse where children and vulnerable adults are manipulated and coerced into committing crimes.

Female genital mutilation (FGM): This is a form of child /vulnerable adult abuse, it's dangerous and a criminal offence in the UK. FGM is the partial or total removal of external female genitalia for non- medical reasons.

Bullying and Cyberbullying: This is behaviour that hurts someone else. It includes name calling, hitting, pushing, spreading rumours, threatening or undermining someone. Cyberbullying is bullying that takes place online. Unlike bullying in the real world, online bullying can follow the individual wherever they go, via social networks, gaming and mobile phone. Bullying can happen anywhere – at school, at home or online. It's usually repeated over a long period of time and can hurt a child / vulnerable adult both physically and emotionally.

Child / vulnerable adult trafficking: Trafficking is where children / vulnerable adults are tricked, forced or persuaded to leave their homes and are moved or transported and then exploited, forced to work or sold.

Grooming: This is when someone builds a relationship, trust and emotional connection with a child or vulnerable adult so they can manipulate, exploit and abuse them. Children and vulnerable adults can be groomed online or in the real world by a stranger or by someone they know - for example a family member, friend or professional.

Non-recent abuse: This is sometimes called historical abuse. It's when an adult was abused as a child or young person under the age of 18. Sometimes adults who were abused in childhood blame themselves or are made to feel it's their fault.

Homelessness: Although this does not form part of the NSPCC's definitions, it is a serious safeguarding issue. The definition of homelessness varies, but it is the condition of lacking stable, safe and adequate housing. You can also be considered homeless if you are:

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- staying with friends or family
- staying in a hostel, night shelter or B&B
- squatting
- at risk of violence or abuse in your home
- living in poor conditions that affect your health
- living apart from your family because you don't have a place to live together

The Prevent Duty

The London Institute of Banking & Finance Ltd is subject to the Prevent element of the Counter-Terrorism and Security Act implemented in September 2015. The Prevent strategy is designed to help prevent people from being drawn into terrorism. All student-facing staff are required to undertake relevant training and asked to follow the procedures as set out in this policy in the event of an incident.

Role of the Designated Safeguarding Lead

The role of the Designated Safeguarding Lead (DSL) is to:

- Implement a strategy for training staff.
- Ensure that policies and procedures are annually reviewed and updated if necessary.
- Take a lead in investigations for child / vulnerable adult protection.
- Keep appropriate records securely.
- Support staff and students – challenge/review the handling of situations.
- Pass on information on a 'need to know' basis.
- Have an oversight of the 'bigger picture'.
- Attend relevant meetings.
- Follow up on referrals if no response.
- Provide an annual report to the Board of Directors

Role of the Deputy Safeguarding Officer

The role of the Deputy Safeguarding Officer (DSO) is to:

- Take a lead in investigations for child / vulnerable adult protection in the absence of the DSL.
- Keep appropriate records securely.
- Support staff and students – challenge/review the handling of situations.
- Pass on information on a 'need to know' basis.
- Have an oversight of the 'bigger picture'.
- Attend relevant meetings.
- Follow up on referrals if no response.
- Communicate information to staff/students/learners as appropriate

Policy Aims

The aim of this Policy is to promote best practice by:

- Providing all children and vulnerable adults engaged in activities with appropriate safety and protection whilst in the care of The London Institute of Banking & Finance staff.
- Enabling staff to make informed and confident responses to child protection and safeguarding issues.

Good practice for working with children and vulnerable adults

All staff, including Outreach Ambassadors, are encouraged to follow the good practice below:

- Always work in an open environment, in groups wherever possible. Where one-on-one contact cannot be avoided, always keep the door open and inform other members of staff of your course of action.
- Treat all children and vulnerable adults equally, with respect and dignity in accordance with The London Institute of Banking and Finance Equality and Diversity Policy.
- Always put the welfare of children and vulnerable adults first except in circumstances where you yourself are at risk of harm.
- Maintain safe and appropriate distances at all times, and avoid unnecessary physical contact.
- Be an excellent role model.
- At events where a member of school or college staff is not present, always secure parental/guardian consent (in writing) to act in 'loco parentis'. Consent to administer emergency first aid and/or medical treatment should be sought before the event is held. Parents/guardian should be kept informed in the event of accidents or emergencies.
- Keep a written record of any injury or disclosure that occurs, including details of treatment or action taken on the accident report form or incident report form (see Appendices 1 and 2).

Emergency Situations

In an emergency situation, where there is a direct threat to life, staff should contact the emergency services directly.

Incidents that must be reported/recorded

If any of the following occur, staff, including Outreach Ambassadors, should report this immediately to the Designated Safeguarding Lead / Deputy Safeguarding Officer and complete the relevant form (accident report or incident report).

- If you accidentally hurt a child / vulnerable adult.
- If a child / vulnerable adult accidentally hurts themselves or others.
- If a child / vulnerable adult seems unduly distressed in any manner.
- If a child / vulnerable adult seems sexually aroused by your actions.

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- If a child / vulnerable adult misunderstands/misinterprets something you have done to the point of concern.
- If a child / vulnerable adult discloses something to you that puts them or others at risk of harm, noting that there is a mandatory duty to report female genital mutilation (FGM).
- If you suspect the child / vulnerable adult is being abused.

Photography and Media Permissions

Staff must check whether permission has been granted before allowing any participant to feature in publicity material. Additionally, Staff must ensure that permission for photographs and/or other publicity materials has been requested from participants' legal parental guardians if there is the likelihood that media is required.

Recruitment Activities (including Summer Taster Programme)

Staff are not responsible for the welfare of participants both (a) before they arrive at The London Institute of Banking and Finance campus and (b) once participants have left The London Institute of Banking and Finance campus on the final day of the Summer Taster Programme. Participants and their parents/guardians are made aware of this in writing prior to the summer/autumn university and give their consent in writing. All staff working on the Summer Taster Programme must hold a satisfactory DBS check.

Recruitment, Employment and Deployments of Staff

All reasonable steps are taken to ensure that unsuitable persons are prevented from working with children / vulnerable adults. All permanent and fixed-term contract staff are subject to a number of pre-employment checks as detailed in Stage 5 of our Procedure for Recruiting Staff:

Stage 5: Pre-employment checks

1. Evidence of eligibility to work in the UK.
2. Qualification check – highest level achieved.
3. Disclosure and Barring Service – basic check.
4. Fitness to Work.
5. Two references from previous employers.
6. Identity check and proof of address.
7. Employment history for last five years.
8. Credit reference check.

All those that are engaged to work with our apprentices are also subject to a basic DBS check and are required to read, understand and accept all relevant policies including the Prevent Duty Guidance, Safeguarding Policy and Mental Health Guidance.

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Guidance for staff on actions to take if concerned about the welfare of a child / vulnerable adult

It is not the responsibility of staff or Outreach Ambassadors to decide whether, or not, abuse has taken place. There is however a responsibility relating to the duty of care to act on any concerns by the immediate reporting of concerns to the Designated Safeguarding Lead / Deputy Safeguarding Officer. Every effort should be made to ensure that confidentiality is maintained for all concerned. Information should be handled and disseminated on a need-to-know basis only.

Responding to a disclosure:

- React calmly.
- Assure the child / vulnerable adult they are not at fault.
- Take the child / vulnerable adult seriously.
- Keep questions to a minimum (and only ask open questions).
- Maintain confidentiality but do not make promises you can't keep.
- Explain to the child / vulnerable adult that you may need to share your concerns with someone who is in a position to act and that you cannot keep safeguarding concerns a secret.
- Make a full written record of what has been said, heard and/or seen as soon as possible (see 'Record Keeping').

It is recommended that staff read the Department of Education's guidance documentation: ['What to do if you're worried a child is being abused'](#)

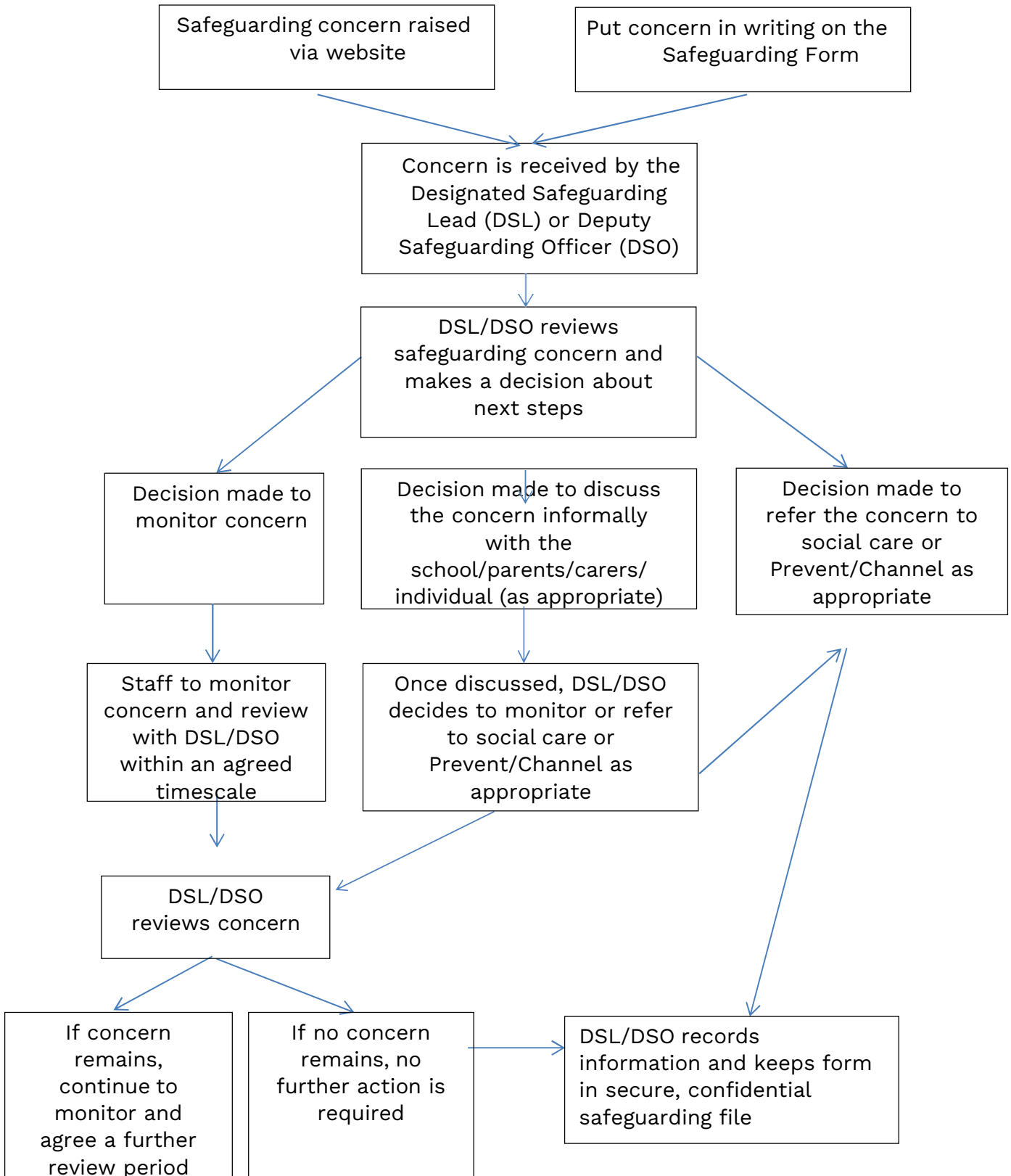
Record Keeping:

- Record the date, time and the place where the disclosure took place.
- Make a note of key words and phrases used – do not interpret the individual's words.
- Avoid slang/abbreviations in your own comments /opinions.
- Records should be written within 24 hours of an incident or disclosure.
- Show the written record to the child /vulnerable adult if possible and ask them to check for accuracy.
- Send the completed form to the Designated Safeguarding Lead / Deputy Safeguarding Officer.

Safeguarding Form involving children or vulnerable adults

Your name:
Your position:
Individual's name:
Gender:
Child's school or college (if appropriate):
Date, time and place of incident:
Your observations:
Exactly what the individual said and your responses – record actual details. Continue onto separate sheet if necessary.
Checked for accuracy by individual: YES / NO
Action taken so far:
Date and time reported to member of staff:
Signature of person completing form:
Date:
Please forward this form to the Designated Safeguarding Lead / Deputy Safeguarding Officer.

Flow Chart – raising safeguarding concerns about a child or vulnerable adult



Accident Report Form involving children or vulnerable adults

This form should be completed following an accident, injury or in the event that someone is unwell. The form should be completed soon after the event (within 24 hours) and sent to the Designated Safeguarding Lead / Deputy Safeguarding Officer

Name of person completing form			
Date		Time	
Event			

Name of person/people involved in accident	
Description of incident/accident	

Is there parental consent to act in 'loco parentis'?	YES / NO or Not applicable
Is there consent in place to administer medical treatment?	YES / NO or Not applicable
Actions taken and by whom	
Medical treatment administered	
Name and position of person administering treatment	

Follow-up action required?	
Other comments	

Signature(s) of person/people involved	
Signature of person completing form	

Contacts

NSPCC helpline

Address: Weston House, 42 Curtain Road, London EC2A 3NH

Phone: 0808 800 5000

Adult Social Care Team – City of London

Call **020 7332 1224** - 9am - 5pm, Monday to Friday.

Call **0208 356 2300** - for all other times, including weekends and Bank Holidays

Email: adultsduty@cityoflondon.gov.uk

Single Point of Access is a first point of contact for people in need of urgent help or are in a crisis. Trained mental health advisers can provide help and advice.

Single Point of Access is open 24 hours a day, seven days a week, 365 days a year.

Tel: **0800 328 444**

Prevent / Police issues

City of London Police

Contact telephone numbers:

Dial 999 in an emergency

Dial 101 in a non-emergency