

# INTO CITY SAFEGUARDING POLICY

## Introduction

INTO City, University of London is governed by the Joint Venture Board.

The Joint Venture Board will have ultimate responsibility and accountability for ensuring a safe learning and working environment for all our students and staff in each Centre.

The safeguarding policy applies to all staff and should be read in conjunction with the overarching Safeguarding and Prevent policy from City, University of London.

The governing body takes seriously its responsibility under Section 175 of the Education Act 2002 to safeguard and promote the welfare of children; and to work together with agencies to ensure adequate arrangements within our Centre are in place, to identify, assess and support those children or young persons who may be suffering from harm.

The Joint Venture board is committed to and has a statutory and moral duty to ensure that each Centre functions with a view to safeguarding and promoting the welfare and wellbeing of children, young people and adults. The definition of 'children' applies to those students under the age of 18. The Joint Venture recognises that some adults are also vulnerable to abuse. This policy may be applied (with appropriate adaptations) to allegations of abuse and the protection of children, young people and vulnerable adults.

This policy underpins all our pastoral and academic responsibilities to our students and should be considered alongside other related policies and procedures in place for students and staff. Such policies can be found in the Student and Staff Handbooks.

For the purpose of this policy, the term 'Centre' will also refer to INTO City, University of London. This term will be used interchangeably throughout this policy. The term 'student' will encompass any learner under or over the age 18 inclusive of any study programme they are registered to at the Centre.

## Policy Statement

INTO City, University of London recognises that it has a responsibility to ensure students, young persons and adults are kept safe from harm or potential harm and to promote the welfare of children and adults who may be at risk.

The Centre aims to provide a safe and supportive environment in which it is safe to work and study whilst ensuring equality of opportunity for all our students.

A small proportion of our students begin their studies at INTO City, University of London under the age of 18. Under 18s are legally considered minors in the UK. As a result, students under the age of 18 will receive further advice, guidance and support during their studies with us. INTO City, University of London does not act in loco parentis for under 18 students.

All adults working for INTO City, University of London are to abide by this policy.

## Policy Review

This policy will be reviewed annually by the following Designated Safeguarding Leads within INTO, the Centre and City, University London:

- VP, UK Operations and Policy (INTO Partnerships)
  - Strategic Lead for policy (safeguarding and compliance across UK Centres)
- Principal Safeguarding & Welfare Lead (City University)
  - Strategic Lead for Safeguarding and Prevent at City University
- Centre Director (INTO City, University of London)
  - Designated Lead for Students

- Head of Student Services (INTO City, University of London)
  - Designated Lead for Students
- Human Resources Manager, INTO (Middlesex Street Centre Lead Counter-signatory for Disclosure and Barring Service, Designated Safeguarding Lead for Staff)

The annual review will ensure the Safeguarding Policy remains fit for purpose and meets statutory requirements. The individuals listed above are responsible for the compliance of relevant legislation, best practice, training, and communication to colleagues working within INTO City, University of London for compliance.

## Scope of the Policy

The Safeguarding policy applies to all colleagues working part-time or full-time at the Centre, contractors working under self-employed arrangements, visitors, agency workers, volunteers, and alumni.

Colleagues must agree to the following conditions:

- Student wellbeing, welfare and safety is of the highest priority.
- Student safety and the right to be protected is a right for anyone studying.
- Safeguarding is everyone's responsibility.

## Aim of the Policy

- To provide a safe learning environment for all students.
- To ensure that all teaching & non-teaching staff here at INTO City, University of London are aware of the needs of students and young people.
- To promote good practice and outline a clear structure for staff to be able to report abuse.
- To ensure that all adults within the Centre who have access to children and young people have been checked as to their suitability. This includes any volunteers and student ambassadors.
- To report safeguarding concerns to the Tower Hamlets Safeguarding Children's Partnership (THSCP) in accordance with the Local Authority Designated Officer (LADO) procedure and their referral [flowchart](#)
- To report concerns regarding a child or young person, who may be abused, neglected or harmed to the 'duty care worker' at Multi-Agency Safeguarding Hub (MASH) via our 'Designated Safeguarding Lead'.

## Linked policies and documents

The Safeguarding Policy may be used in conjunction with other policies and with the overarching [Safeguarding Policy at City, University of London](#). The additional policies and documents that may be referred to within this policy as an example would be;

- Staff and Student Handbook
- Attendance Policy
- First Aid Policy
- IT Acceptable Use Policy
- Inclusive Risk Assessments and Management Plan
- HR Guidelines on Recruitment and Selection
- Prevent Strategy, Risk Assessment and Action Plan
- Guest Speaker Policy
- Under 18s Statement

## Code of conduct

INTO City, University of London does not tolerate inappropriate behaviour from either colleagues or students and believe all should be treated with respect and should not be subject to any kind of abuse.

The below guidelines highlight expectations for all adults working with children and vulnerable adults within the Centre need to be aware of in order to create a safe culture and environment.

More details can also be found in the Staff Handbook and Student Handbook.

In all dealings with children and vulnerable adults, INTO City, University of London expects all staff, including group leaders, volunteers, homestay hosts and students to:

- Respect people's right and their personal privacy
- Use appropriate and respectful language
- Be aware of and respect possible cultural differences.
- Challenge inappropriate or unacceptable behaviour and/or report to the designated senior member of staff;
- Report any allegation or suspected case to the designated senior member of staff;
- Maintain professionalism and keep clear boundaries;
- Be aware of company guidelines and policies set out for protecting both staff and students.

Please note that this list is not exhaustive and all staff and students should apply sensible and appropriate conducts under any circumstances.

## **Safer Recruitment and Selection**

As part of our Safer Recruitment Practices to ensure safeguarding procedures are upheld, applicants are asked to note that:

- An enhanced DBS will be required.
- All gaps in the application form must be explained satisfactorily.
- Proof of identity and right to work in the UK must be provided.
- Original certificates must be provided for all relevant qualifications.
- References are mandatory and a condition of probation
- References will ask specifically whether there is any reason that the candidate should not be engaged in situations where they have responsibility for, or substantial access to, persons under 18.
- Appropriate suitability checks will be required prior to confirmation of appointment.

## **Centre Responsibilities**

As a pathway provider, INTO City, University of London has a diverse student population. The Centre ensures through the Joint Venture that it continuously meets its statutory requirements for safeguarding children and vulnerable adults.

All staff have a full and active role in protecting children, young people and vulnerable adults from harm. The Designated Safeguarding Lead or Vulnerable Adults Lead or their deputies oversee and co-ordinate safeguarding procedures, assess all cases of suspected abuse and liaise with external agencies as required.

The Centre Risk ensures risk assessments for the below are carried out where appropriate and necessary and records are kept on file. Please also refer the relevant Staff Handbook for further guidance.

- INTO City, University of London and its building
- Any INTO City, University of London student accommodation.
- In-house social activities and events
- Off-site social activities, events and excursions.

## **Named Contacts for Safeguarding**

The Designated Safeguarding Leads and Deputy Safeguarding Lead within the Centre are as follows:

- Centre Director (Designated Safeguarding Lead - strategy) – Adelina Melillo
- Head of Student Services (Designated Safeguarding Lead - students) – Marko Cekerevac
- Student Services Senior Officer (Deputy Designated Safeguarding Lead - students) – Kavisha Gungabissoon
- Academic Director (Designated Safeguarding Officer) – Poh Leng Wendelkin
- Student Services Student Experience and Engagement Officer (Designated Safeguarding Officer) – Isabelle Gosse

- Student Services Wellbeing Officer (Designated Safeguarding Officer) – Eve Kettlewell
- HR Senior Manager – (Designated Safeguarding Lead Staff) – Oliver Smith

Email: [into-studentwellbeing@city.ac.uk](mailto:into-studentwellbeing@city.ac.uk) (student DSL contact point)

Email: [hr.intomiddlesexstreet@intoglobal.com](mailto:hr.intomiddlesexstreet@intoglobal.com) (staff DSL contact point)

**The Centre Director/ Head of Student Services manages operational safeguarding for students and is responsible for:**

- Overseeing the referrals of cases of suspected abuse or allegations to Social Care, LSCPs or other appropriate agencies
- Safeguarding risk management
- Providing training, advice and guidance to support other members of staff on issues related to child protection/ adults at risk
- Maintaining a proper record of any referrals, complaints or concerns
- Ensuring all staff receive Safeguarding Level 1 training, Prevent training and child protection training and are aware of the referral process within the Centre
- Provide regular updates to SMT regarding safeguarding
- Provide regular reports to SMT and Safeguarding Lead at City, University of London setting out how the Centre has discharged its duties.

**The Deputy Designated Safeguarding Lead (DSL) for students:**

The Student Services Team Leader is the Deputy DSL (Students). They oversee the day-to-day management of the Student Services Team and will cover the responsibilities of the Lead DSL (Students) in their absence.

The Deputy DSL maintains responsibility for day-to-day safeguarding of students. The Deputy DSL will receive training in child protection issues, inter-agency working and managing staff allegations as required by Keeping Children Safe in Education and the Local Safeguarding Children Partnerships, and will receive refresher training at least every two years. The Deputy DSL should keep up to date with developments in child protection/safeguarding/adult at risk issues.

**HR Manager DSL Lead for Staff:**

The HR Manager is responsible for the management of the electronic Disclosure and Barring Service (DBS) and contract management in order to risk manage safeguarding. Lead and be responsible for reporting allegations of abuse against staff to the Independent Safeguarding Authority part of the DBS. Lead and manage the recruitment and selection process in line with safer recruitment and ensure all relevant pre-employment checks for all staff, agency workers, volunteers etc are satisfactorily completed.

Other responsibilities are detailed as follows:

- Responsible for managing the Single Central Record report which contains the evidence of all pre-employment checks completed in compliance with Keeping Children Safe in Education regulations.
- Ensure all managers responsible for recruitment are appropriately trained on safer recruitment.
- Lead on the management of complaints made against staff and any subsequent investigations.
- Assist in the training and development of all Staff, agency workers, and volunteers for safeguarding.
- Ensure that all staff are fully aware of their safeguarding responsibilities and the appropriate action to take in the event of an issue arising or being identified.
- Annually review the Staff Code of Professional Conduct which incorporates clarification on safeguarding.

**Local Authority Contacts Information:**

- Multi-Agency Safeguarding Hub (MASH) (Referral Point)
  - Tel: 020 7364 5601 / 5606
  - Email: [MASH@towerhamlets.gov.uk](mailto:MASH@towerhamlets.gov.uk)

- Secure email: [MASH@towerhamlets.GCSX.gov.uk](mailto:MASH@towerhamlets.GCSX.gov.uk)
- Police Child Abuse Investigation Team (CAIT)
  - Tel: 020 8217 6484
- Local Authority Designated Officer (LADO)
  - Tel: 020 7364 0677 / 5290
  - Email: [LADO@towerhamlets.gov.uk](mailto:LADO@towerhamlets.gov.uk)
  - Child Protection Advice Line on Tel: 020 7364 3444 / 5601 / 5606
- Early Help Hub Website: <https://forms.towerhamlets.gov.uk/service/ehenquiries>
  - Tel: 020 7364 5005
  - Email: [earlyhelp@towerhamlets.gov.uk.cjsm.net](mailto:earlyhelp@towerhamlets.gov.uk.cjsm.net)
- Domestic Abuse and Victim Support Website:
  - Tel: 0800 279 5434
  - Email: [domestic.violence@towerhamlets.gov.uk](mailto:domestic.violence@towerhamlets.gov.uk)

## **Safeguarding and Wellbeing Provision:**

All students are given opportunities at different stages for them to disclose their age and/or any disability or medical condition that may deem them as either children or vulnerable adults.

If students are identified as children at the point of entry onto their programmes, the INTO City, University of London Under 18 Policy will be applied and explained to both the child and their parents/appointed guardian prior the student's arrival; either via email or through our appointed education counsellors.

Once the student arrives in Centre, a designated member of staff will arrange to meet with all students under the age of 18 and explain the support in place for them and clear reference of the Student Handbook for queries relating to attendance, behaviour, services available etc.

INTO City, University of London also provides an airport transfer service, which is highly recommended for all students under the age of 18, for their arrival pick-up and departure. If students arriving from outside the UK wish to opt out of the service, a written confirmation from their parent(s)/appointed guardian is required with details of the person meeting the student at the airport and their arrival date and time.

Students may disclose information that deem them as vulnerable adults either prior or after their arrival to Centre. Usually, it is more advisable for them to disclose before they arrive if conditions are known, so that the Centre can make suitable adjustments and arrangement in advance. The Centre also understands in certain cultures or some circumstances, students may not realise their conditions, which will possibly be noticed by their tutors or other staff after they start their study programmes.

## **Potential Indicators of Harm:**

All staff will be expected to complete Safeguarding Level 1 training, GDPR and Prevent training during their first week as an employee. Refresher training is to be completed annually by all staff. All staff are required to have read, understood and have access to [Keeping Children Safe In Education](#).

The purpose of safeguarding training will be to understand the potential indicators of harm, appropriate referral pathways and to enforce safeguarding is everyone's responsibility. The list below is not exhaustive but provides an overview of some of the harms we need to be aware of and escalate to the Designated Safeguarding Lead when disclosed:

- Physical Abuse
- Emotional Abuse
- Neglect
- Sexual Abuse
- Financial Abuse
- Peer-on-Peer abuse
- Online abuse
- Cyberbullying
- Sexting

- Child Sexual Exploitation/ Child Criminal Exploitation
- Radicalisation

## **Staff Guidance: Support, Hints and Tips:**

### **Child Protection & Vulnerable Adults Guidelines Staff Responsibilities:**

- Acknowledge your duty of care to ensuring the well-being & safety of staff and students.
- Complete the online Prevent, Child Protection and GDPR training.
- Read and understand and adhere to the Safeguarding Policy.
- Know the correct procedure for reporting child protection and vulnerable adult concerns.
- Do not ignore something which causes you concern for the safety of a student or member of staff; discuss the matter with a named DSL for advice on how to proceed.
- Do not attempt to investigate a potential child protection or vulnerable adult disclosure yourself, pass this on to a named DSL; they are trained for these situations.
- If a student discloses a potential safeguarding concern, stay calm.
- Explain to the student that you are required to pass this on to the Designated Safeguarding Lead and never promise confidentiality.
- Always ensure that when you refer, the student remains where they are; do not allow them to leave until a Designated Safeguarding Lead has spoken to them. If necessary, ask a colleague to suit

### **Professional Boundaries:**

- As an INTO City, University of London member of staff it is your responsibility to protect yourself from potential allegations of abuse.
- Build positive nurturing relationships with students that maintain high standards and provide clear boundaries of professional conduct and behaviour.
- Never give students your personal phone numbers, email addresses and address information.
- Do not 'add, friend, accept' students or engage with students via your personal social media accounts.

### **Disclosures: Hints and Tips:**

- As a tutor you will establish a good relationship with your students and will get to know them very well. If you are concerned about a student, talk to them.
- Go to a meeting room so you can have a 'confidential' discussion.
- Do not promise to keep things secret, be clear that you may share what is discussed.
- Be open and honest about why you want to talk to them.
- Describe the behaviour you have witnessed, give clear examples and use evidence.
- Explain you are there to help and support them.
- Ask them if they wish to share anything with you.
- Do not pry, challenge or react negatively if they tell you they do not wish to tell you.
- Do not lead students to make statements or used closed questions.
- React positively that they have chosen to disclose, don't get angry or be shocked at what they tell you.
- Tell them they have done the right thing in telling you.
- Explain that you will need to pass the information on to someone who will be able to support them further.
- If a student discloses some information that you are very concerned about seek support from the Student Services Team Leader/ Head of Student Services immediately.
- Make notes where possible of what they say, use their words.
- Let them know the support available at the Centre and how they access it through the Student Services.
- If necessary, support them in accessing the service by providing the relevant contact information or offering to accompany them to their initial meeting.
- Contact a Designated Safeguarding Lead immediately.

### After a Disclosure:

- Speak with your Line Manager to let them know what has happened and do talk about how it made you feel.
- Keep confidentiality and do not speak about the incident unless necessary.
- Only disclose this information to key staff such as Designated Safeguarding Lead or your Line Manager.

## Unexpected Centre Closures

Additional support may be required during unexpected University closures (i.e. pandemic, enforced closures, transport closures).

Support with mental health and wellbeing will be made available to all students. Student Services Teams and Academic Management Teams will be given more time to support staff and students during these periods of closure.

All staff should be particularly vigilant to new and additional wellbeing concerns and safeguarding concerns that may have arisen due to the pandemic. It is important they act immediately on any safeguarding concern by reporting these to the Student Services Team Leader/ Head of Student Services.

## Prevent

INTO City, University of London is committed to the safeguarding of its students from extremist materials and organisations. INTO City, University of London Section acknowledges its responsibility to ensure it complies with [Prevent Duty Guidance: England and Wales 2023](#) to have “due regard to the need to prevent people from being drawn into terrorism”. All students and staff adhere the IT Acceptable Usage policy from City, University of London and Middlesex Street which employs advanced web filtering. INTO City, University of London is committed to the ‘Channel’ process and follows City, University of London’s Prevent Policy, Action Plan and Risk Assessment.

Version	Name of owner	Date of Change	Changes Noted
Version 9	Marko Cekerevac	July 2024	City University Safeguarding Policy linked and referenced as ‘overarching Policy’