

 <b>S P Jain London School of Management</b>	<b>Safeguarding Policy</b>
Document Type	Policy
Administering Entity	Director of Student Experience, Admissions, Registrar
Latest Approval/ Amendment Date	
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## 1 Introduction

- a. S P Jain London School of Management (SPJUK) has a duty, both in law and as a responsible organisation, to safeguard and promote the welfare of children (under 18 years of age). SPJUK is committed to providing a safe and secure environment for all students, staff and visitors who access its facilities, services and participate in activities.

## 2 Scope

- a. Safeguarding is the action that is taken to promote the welfare of children. Safeguarding is action taken to promote the welfare of children and protect them from harm.
- b. A child is defined as anyone who has not yet reached their 18th Birthday. 'Children' therefore means 'children and young people' throughout.

## 3 Roles & Responsibilities

- a. All members of the SPJUK community have a responsibility to understand how to look for and respond to types and signs of abuse in children.
- b. SPJUK cannot act *in loco parentis* (in place of a parent) therefore, ultimate responsibility for children lies with parents and guardians. Any offer of admission or inclusion in an activity is made with an assumption that a child can engage in such an environment, and able to act appropriately, responsibly, legally and within the confines of the Student Code of Conduct.
- c. SPJUK does not take responsibility for the student when they are not in attendance, this includes the student's free time, travel and when they arrive the UK. The School does not own or operate any official halls of residence. Organising suitable rented accommodation and dealing with any issues that arise within that accommodation is the responsibility of parent/guardian and student. However, the School can give advice on suitable accommodation.

#### **4 Admissions**

- a. All students under the age of 18 must have written consent from their parents in order to be admitted to the School. In addition, the School requires international students under the age of 18-years old obtain a UK guardian who will act as their emergency contact whilst they are studying in the UK. It is recommended that the Guardian be a family friend or relative or, where this is not possible, they can obtain a guardian through an agency; please see [The Association for the Education and Guardianship of International Students](#) for further details. SPJUK is unable to provide guardians to students, it is the parent's responsibility to choose, arrange and potentially pay for an appropriate person. The School must be notified of any change in guardian at the earliest opportunity in accordance with the Children Under 18 Policy.

#### **5 Induction**

- a. There will be a dedicated induction session for students under the age of 18. In this meeting, students will meet key members of staff from the student welfare team and the SPJUK's Safeguarding Officer. The remit and boundaries of SPJUK's services as outlined in this policy will be explained.

#### **6 Participation in activities**

- a. Students under the age of 18 at SPJKUK should be aware that their participation in some activities may not always be permitted or may require separate explicit consent from their parents/guardian. This is due to factors like independent travel, inappropriate content or overnight arrangements. Participation is at the discretion of the School and where the decision is made for participation to be denied we will endeavour to explain and justify such decisions.

#### **7 Safeguarding Officer**

- a. The Director of Student Experience will act as the School Safeguarding Officer and is the first point of contact for anyone with safeguarding concerns. They will also be responsible for disseminating information about SPJUK's safeguarding provisions and advise on all safeguarding matters. In addition, the Safeguarding Officer will complete risk assessments for any new or changed activity (course, programme, or event) that involves children.
- b. The Safeguarding Officer or other members of the welfare team will meet weekly with students under 18 to ensure that they are progressing with their studies and that there are no concerns.

#### **8 Staff Procedures**

- a. Staff are encouraged to follow best practice in regard to students under the age of 18:
  - i. Treat them fairly and without prejudice, ensuring that their contributions are taken seriously
  - ii. Not engage in any inappropriate physical contact.
  - iii. Where possible, always work in an open environment, avoiding activities with lone students behind closed doors or in private, unobserved situations
  - iv. Discourage all types of physical conduct that the student may wish to initiate
  - v. Not to communicate with a student outside the School's communication systems in line with the Staff Code of Conduct and Social Media Policy.

## 9 Child Protection

- a. Child protection focuses on protecting individual children identified as suffering or likely to suffer significant harm. Children are a group susceptible to exploitation and abuse. Below are some examples that relate to children and adults at risk of harm.
- b. **Physical abuse** is the inappropriate or unlawful use of restraint, such as assault, hitting, slapping, punching, kicking, hair-pulling, biting, rough handling, scalding, and burning.
- c. **Emotional Abuse** is the persistent emotional ill treatment of a child or vulnerable adult which can cause adverse effects on their emotional development. Changes in behaviour such as a sudden speech disorder, fear of making mistakes, self-harm, or fear of a parent/guardian being approached may indicate this.
- d. **Sexual Abuse** involves the forcing or enticing of a child or vulnerable adult to take part in sexual activities whether or not they are aware of what is happening. In addition, although a child can consent to sexual activity once they reach 16, it is a criminal offence for an adult to engage in sexual activity with anyone under 18 when the adult is in a position of trust in relation to the child. All staff are considered to be in a position of trust.
- e. **Neglect** is the persistent failure to meet a child's basic and/or psychological needs. It can constitute a parent/guardian failing to provide adequate food, shelter, clothing, protection from harm, or appropriate medical care. Refusal to respond to a child's basic emotional needs can also be classed as neglect. Being always hungry, thin and malnourished, looking badly presented, parent/guardian seeming uninterested and/or not having access to basic study needs may indicate neglect.
  - i. Other types of safeguarding issues include:
  - ii. Child trafficking and modern slavery
  - iii. County lines
  - iv. Cuckooing
  - v. Extremism
  - vi. Fabricated or induced illnesses
  - vii. Female Genital Mutilation (FGM)
  - viii. Forced Marriage
  - ix. Honour-based violence/abuse
  - x. Online abuse
  - xi. Peer-on-peer abuse
  - xii. Radicalisation
  - xiii. Sexual violence and harassment

- 10 Any staff member that has concerns for the safety and well-being of a student under the age of 18 should take those concerns immediately to the Safeguarding Officer. If the threat is immediate, they should contact the appropriate authorities.

## 11 Disclosure

- a. Guidance for handling a Disclosure or Concern:
  - i. Take all complaints, allegations, or suspicions seriously
  - ii. Ensure the immediate safety of the person affected

- iii. Stay calm, and offer support and reassurance to the person making the disclosure
- iv. Do not make any promises regarding confidentiality
- v. Listen, keep questions to a minimum, make brief but careful notes and check the person affected agrees with them (where applicable)
- vi. Explain what you will do.

## **12 Maintaining confidentiality**

- a. The School acknowledges that it is necessary to maintain and respect confidentiality. However, appropriate disclosure to designated officers or external agencies may be required to ensure that the safety of children at the School is maintained.
- b. Normally, personal information should only be disclosed to third parties with the consent of the person that the information relates to. Wherever possible, consent should be obtained in writing before sharing personal information with third parties. In some circumstances, consent may not be possible or desirable but the safety and welfare of the student dictates that the information should be shared.
- c. If a student confides in a member of staff and requests that the information be kept confidential, it is important that the member of staff tells the student, in an appropriately sensitive way, that he or she has a responsibility to refer cases of alleged abuse to the appropriate people in accordance with this policy. However, the student should be assured that the matter will be disclosed only in accordance with this policy and procedures, which should be explained to them.

## **13 Dealing with referrals**

- a. Once a referral is made to the Safeguarding Lead they will ensure that the individual is not in any immediate danger and seek medical attention if needed.
- b. Where it is decided that it is necessary to take action following a disclosure of abuse, the Safeguarding Lead will contact the LADO, local social services and/or the police as appropriate.
- c. A written record of the date and time of the report should be made, and the report must include the name and position of the person to whom the matter is reported, maintaining a single copy of that report which will be safely maintained by Student Welfare on behalf of the School. The telephone report must be confirmed in writing, using the appropriate referral form where possible, to the LADO within 24 hours. All staff should be aware that well-kept records are essential for good practice.
- d. When a student is not sure about taking the allegation forward, the Safeguarding Lead and the COO will make a decision based on the information provided and seek advice from the LADO, social services or the police as necessary.
- e. In all circumstance the individual will be kept at the centre of the decision-making process. LADOs and the of other professional's views will be taken into consideration. However, it remains the responsibility of the Safeguarding Lead to take whatever action is necessary to ensure the individual's safety and that of any other person who may be at risk.

#### **14 Allegations against other members of the School**

- a. If there are allegations of abuse or other issues that involve staff, students or Directors of the School, these should be discussed by the Director of Student Experience and the COO and referred to the appropriate disciplinary procedure.
- b. The School will need to inform the Disclosure and Barring Service if a member of the School is
  - i. Dismissed/removed because they have harmed a child or vulnerable adult.
  - ii. Dismissed or removed from regulated activity because they may have harmed someone.
  - iii. planning to dismiss or remove them for either of these reasons but the person resigned first.

#### **15 Training**

- a. Relevant staff will receive training which will adequately familiarise them with issues and responsibilities relating to safeguarding students under the age of 18 in addition to the School's procedures and policies, undertaking refresher training or updating annually as appropriate and as and when updates are required. A record of training will be maintained by HR.
- b. The Safeguarding Lead will undertake appropriate training and receive refresher training every 2 years. They will be required to keep up to date with any changes as appropriate and following significant legislative change.

#### **16 Safer recruitment**

- a. The School will seek to ensure that unsuitable and/or barred people are prevented from working with students under the age of 18 and will follow safe recruitment practices. The Director of Student Experience and student welfare/counselling staff will be DBS checked as a matter of course. Where the School admits students under 18, the Programme Director will act as their personal tutor and will also be checked as well as other staff who will come into contact with the student.

#### **17 Student DBS checks**

- a. When recruiting students on volunteering activities, including outreach work, where they will engage in Regulated Activities relating to children, DBS checks will be required.

#### **18 Medical Emergencies**

- a. Students who are over the age of 16 are able to give consent for most medical treatment without a parent's knowledge. Treatment will remain confidential. Where this is not possible SPJUK will contact the parents/guardians, in extreme cases where it has not been possible to contact the emergency contact SPJUK can authorise emergency medical treatment. SPJUK has qualified first aider's onsite, all accidents onsite are recorded in the accident record book.

#### **19 Photography and Videoing**

- a. Permission will be sought before images of students and participants are taken. Images/recordings will be stored securely and in line with SPJUK's Data Protection and

Retention policies. Images/recordings cannot be used publicly without express permission and no images of children will be published on the website or elsewhere.

**20 Data Protection**

- a. Data will be stored securely and retained for the designated period for the purposes it was obtained. For further information please see SPJUK's Data Protection and Retention Policies.

**21 Related Documents & Policies**

Data Protection Policy  
Health, Safety and Wellbeing Policy  
Students at Risk Policy  
Student Support Policy  
Student Terms and Conditions  
Under 18's Policy