



Safeguarding policy

London Campus

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Table of Contents

1. Introduction	3
2. Aims and Objectives.....	3
3. School's Approach to Safeguarding	3
4. Responsibility	6
Safeguarding policy	7
Risk Assessment Form.....	7

1. Introduction

The Care Quality Commission defines safeguarding as 'protecting people's health, wellbeing and human rights, and enabling them to live free from harm, abuse and neglect'.

The School is committed to supporting and promoting the welfare of staff, students and visitors and providing a safe environment that is conducive to work, study and the enjoyment of a positive experience for all members of our community.

The School recognises that from time to time its work may bring its staff and students into contact with young persons¹ or vulnerable adults². We aim to take all reasonable steps towards the safety and welfare of such individuals when they are in contact with School staff and students.

2. Aims and Objectives

This Policy assists the School in achieving the commitments mentioned above by ensuring that clear guidelines and procedures are outlined for identifying risks, reporting concerns and taking appropriate action.

The School however cannot act 'in loco parentis' and ultimate responsibility for students under the age of 18 rests with those who have parental responsibility. This policy seeks to support activities involving adults at risk and to offer assurances to staff, students and visitors that safeguarding will be dealt with effectively and in a timely manner.

This policy is complementary to and should be read in conjunction with the following:

- Student Harassment and Bullying Policy
- Prevent Policy
- Health and Safety Policy
- Equal opportunities policy: Code of Practice
- Fitness to Study Policy
- Student Code of Conduct and Disciplinary Procedure
- Staff Disciplinary Procedure

When more than one of the above policies is applicable to a situation, the Safeguarding Policy will take priority. The individual concerned will be informed in writing as to which policy is being used to consider their case.

3. School's Approach to Safeguarding

The School seeks to safeguard vulnerable adults through the following principles:

3.1 Risk Assessment:

¹ Young person those aged 16-18

² Vulnerable Adult: a person who is 18 years of age or over, and who is or may be in need of community care services by reason of mental or other disability, age or illness and who is or may be unable to take care of him/herself, or unable to protect him/herself against significant harm or serious exploitation



Any member of staff who intends to, or may be put in the position of, supervising or working with young people or adults in a vulnerable situation should ensure that they understand the implications of this policy before commencing any programme, event, visit or other activity.

A designated individual (officer) should complete a risk assessment (appended to this policy) before organising any event, visit or any other activity involving young people or adults in a vulnerable situation.

It is important for all those involved in the risk assessment to understand that it is not only a way to mitigate or remove any potential risks but may also be a prompt to consider alternative working practices.

The designated officer must ensure that a record of the risk assessment process and the outcome of risk assessment is made and that any appropriate follow up action is undertaken.

3.2 Recruitment, Selection and employment procedures

The School is committed to taking all appropriate steps during the recruitment and selection process ensuring that unsuitable people are prevented from working with young people and adults in a vulnerable situation.

To this end, the School undertakes Disclosure and Barring Service (DBS) check for those who have substantial one-to-one contact with young people or adults in a vulnerable situation.

3.3 Dealing with the risk of abuse

Concerns for the safety and well-being of young people and adults in a vulnerable situation could arise in a variety of ways and in a range of different settings. For example, an individual themselves may report an abuse; someone may hint that a young person is at risk or that a colleague is an abuser; a third person may witness or hear about abuse of an adult in a vulnerable situation in another organisation. It is essential to act quickly and professionally in all cases of suspected abuse.

Any allegation by a young person or adult in a vulnerable situation against a member of staff or another student should be reported immediately to the relevant designated individual who has responsibility under this policy. In dealing with any such allegation, the School has a duty of care both to the young person or adult in a vulnerable situation concerned and to the member of staff or student against whom the allegation is made.

3.4 Dealing with risk of radicalisation

Any member of the School (student or staff member) may identify concerns about a student potentially being drawn into violent extremism based on information received or behaviour observed. It is important that such concerns can be shared in a safe and supportive fashion to enable concerns to be investigated and an appropriate intervention to be developed, if required.

Our UK Director of Student and Academic Services is the Prevent lead and any such cases must be reported immediately to her. For more details, please refer to ESCP Business School Prevent Policy.

3.5 Dealing with risk of self-harm

Self-harm is when someone deliberately hurts or injures themselves. This can take a number of forms including cutting or burning, taking overdoses of tablets, punching themselves, taking part in risky activity/behaviour swallowing things that are not edible etc. Self-harm can be part of coping with a specific problem. A few people who self-harm may go on to commit suicide - generally this is not what they intend to do.

In situations where a student's behaviour or wellbeing is causing concern, but does not present an immediate crisis, initial support is best handled via the support systems of Programme Managers, Academic Advisors, Academic Director and the UK Director of Student and Academic Services. The student is more likely to respond to such an approach from a member of staff who is familiar with situation, and to take practical advice from someone who is already known to them and who appears to be supportive and non-judgmental.

In circumstances where it is believed that a student's behaviour presents an immediate risk to themselves or others, the emergency services should be called by dialling 999. Security staff must also be notified so that emergency services can be directed to the right location.

Staff members are granted access to Health Assured, a platform designed to provide free Confidential Helpline. On the other hand, students are provided access to International SOS, a service that offers specialised support for their international healthcare needs. The international SOS has experts standing by to provide support and assistance from over 1,000 locations in 90 countries, 24/7, 365 days. Through an Employee Assistance Programme (EAP), the Health Assured intends to help employees deal with personal problems that might adversely impact their work performance, health and wellbeing. EAP generally include assessment, short-term counselling and referral services for employees and their immediate family - wherever they are in the world.

3.6 Whistle Blowing/Public Interest Disclosure

Whistleblowing is an important aspect of a safeguarded institution whereby staff can confidentially share genuine concerns about a colleague's behaviour with a line manager or senior manager or designated safeguarding officer.

Working with vulnerable groups places staff in positions of power. In order to retain the trust of vulnerable people, it is essential that all reasonable steps are taken to ensure this power is exercised responsibly.

In accordance with the Public Interest Disclosure Act 1998, the School will support and protect those staff and students who, in good faith and without malicious intent, report suspicions of abuse or concerns about colleagues and their actions.

3.7 Training and support

The School strives to provide basic safeguarding awareness training to give information and guidance to staff and students about recognising potential risks associated with working with young persons and vulnerable adults, how to report it and by making staff aware that they have a responsibility to report concerns regarding a safeguarding matter to the appropriate person.



3.8 Retaining and Sharing Information

Written records of safeguarding concerns will be retained as long as necessary.

The School reserves the rights to share information about concerns within the School and with external agencies where appropriate, following the School Information Sharing Protocol.

4. Responsibility

The Academic Director or nominee, with advice from the UK Director of Student and Academic Services, will be responsible for monitoring the welfare of under-18 students and adults in a vulnerable situation. This responsibility may be devolved as appropriate.

The Head of People (HR) & Engagement will advise on the employment of under-18 members of staff and adults in a vulnerable situation and, in conjunction with the relevant Head of Department, will be responsible for monitoring their welfare. This responsibility may be devolved as appropriate.

Allegations or suspicions of abuse involving students should be reported to the UK Director of Student and Academic Services. Allegations or suspicions of abuse involving staff in a vulnerable situation should be reported to the Head of People (HR) & Engagement.



Safeguarding policy

Risk Assessment Form

Department:
Activity/Event:
Risks:
Precautions:
Emergency Procedures:
Access Restrictions:
Assessment Undertaken by:
Date: