

Safeguarding & Safety

3.1 Safeguarding Policy and Procedure (including Prevent)

Introduction

The School takes seriously its legal responsibilities and duties to safeguard the welfare of children and vulnerable adults who come onto its premises or come into contact with its staff or students. These powers and duties are set out in the [Children Act 1989](#), the [Children Act 2004](#) and the [Health and Safety at Work Act 1974](#). Recognising that safeguarding is everyone's responsibility, the School's policies and practices follow those set out in statutory and non-statutory guidance including [Working Together to Safeguard Children 2018](#).

The School also acknowledges its responsibilities under the [Counter-Terrorism and Security Act 2005 \(CTSA\)](#), which introduced a new statutory duty for higher education institutions to have "due regard to the need to prevent individuals from being drawn into terrorism" (the "Prevent duty"). Given this responsibility, this Policy and Procedure also covers concerns raised by staff or students relating to radicalisation. Concerns relating to radicalisation may pertain not only to children and vulnerable adults but to all School staff and students.

This Policy and Procedure therefore sets out this School's responsibilities, policies and procedures in relation to the safeguarding of children and vulnerable adults; as well as the procedures for raising any concerns relating to radicalisation. It also describes the School's policy on the employment of ex-offenders and its use of [Disclosure and Barring Service \(DBS\)](#) checks in staff recruitment.

Safeguarding and Prevent: Definitions

Children are people under 18.

Vulnerable adults are adults as defined by section 59 of the [Safeguarding Vulnerable Groups Act 2006](#) as amended by the [Protection of Freedoms Act 2012](#) and/or those persons aged over 18 who by reason of mental or other disability, age or illness are (or may be) unable to take care of themselves or are (or may be) unable to protect themselves against significant harm or exploitation.

Safeguarding is protecting children and vulnerable adults from maltreatment and harm. Harm may be physical, sexual or psychological. This can include protection from involvement with crime and/or terrorism.

Prevent is the Government's anti-radicalisation agenda, embedded in the [Counter-Terrorism and Security Act 2015](#).

A *vulnerable individual* is an individual who is susceptible to being exploited by radical groups and subsequently drawn into terror-related activity.

Academic freedom is the expectation that staff and students shall have the freedom within the law to question and test received wisdom and to put forward new ideas and controversial or unpopular opinions, without placing themselves in jeopardy of losing their jobs or privileges.

Radicalisation is the process by which an individual comes to support terrorism and extremist ideologies associated with terrorist groups.

Extremism is defined by the government as vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. Also included in this definition are calls for the death of members of the British armed forces, whether in the UK or overseas.

Terrorism is an action that endangers or causes serious violence to a person or people; causes serious damage to property; or seriously interferes with or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public, and is made for the purpose of advancing a political, religious, or ideological cause.

Scope

This Policy and Procedure addresses all aspects of child and vulnerable adult protection and safeguarding within the work of the School, as well as on optional internships. The School may encounter children and vulnerable adults in a variety of settings, including outreach activities and as employees. This Policy and Procedure applies to all staff, students and volunteers of the School who encounter children or vulnerable adults as part of their School activities. If they encounter such individuals in another organisation whilst representing the School, they must follow the host organisations' safeguarding procedures.

In relation to radicalisation and the Prevent Duty, this Policy and Procedure applies to all staff and students.

Our Approach to the Prevent Duty

The [CTSA](#) states that in meeting the statutory duty, higher education institutions must have *particular regard* to ensure freedom of speech and the importance of academic freedom. The School, like the government, recognises that HEIs are special places where freedom of speech and academic freedom are vital; our commitment to these can be found in our [Academic Freedom Policy](#), and our [Code of Practice on Freedom of Speech](#).

Therefore, in carrying out its Prevent Duty under the [CTSA](#), the School is careful to ensure that the risks of individuals being drawn into terrorism are carefully weighed against the risks of curtailing academic freedom and freedom of speech. Our approach to the Prevent Duty is proportionate to our size and context; it is risk-based; and it is underpinned by the

values of equality and diversity, which are at the heart of our inclusive approach to teaching and learning. Given the relatively small size and low complexity of the School, and our commitment to enabling an inclusive and open culture, this means that in practice many of the steps the School will take to meet this duty will be light-touch, sensitive, and informal. However, all staff members and students will be instructed on the warning signs of radicalisation; and where staff members or students have concerns that a student may be being radicalised, there is a clear procedure in place for them to raise these concerns to the School's Designated Safeguarding Officer, who will deal with these concerns under the provision of this Safeguarding Policy and Procedure.

The School has developed its approach to the Prevent Duty in line with HM Government's [Prevent Duty Guidance: For Higher Education Institutions in England and Wales](#) and in line with the [relevant guidelines](#) published by the [Office for Students](#) (OfS).

The Prevent Duty as it associates to higher education institutions is an area of strong debate, given the tension between an HEI's duty to prevent individuals being drawn into terrorism and its duty to uphold academic freedom and freedom of speech. That is why the Board of Directors will review the School's approach to its Prevent Duty, as set out in this Safeguarding Policy and Procedure, on an annual basis, to assess the extent to which it strikes an appropriate balance between these two competing duties. This Policy and Procedure will also be reviewed annually from a legal and operational perspective by the Designated Safeguarding Officer, in collaboration with the School's Equality, Diversity and Inclusion Steering Group (EDISG), which includes a student representative.

The School's primary approach to its Prevent Duty is to place inclusivity and the welcoming of diversity at the heart of its teaching and learning model. This will mitigate against factors that can contribute to making individuals vulnerable to radicalisation, such as isolation, lack of integration, inequality and discrimination. This inclusive, diverse approach will be coupled with a strong commitment to pastoral care, with one-to-one personal tutors for all students, and a range of learning, welfare, wellbeing and mental health support services provided by the School's Student Support Department.

Prevent Duty: Related Policies and Procedures

Aside from this Policy and Procedure, there are a number of other policies in place that support the School's discharging of its Prevent Duty, such as:

- The [Code of Practice on Freedom of Speech](#) (which includes the Visiting Speaker Code of Conduct and Procedure), which set out the School's policy and procedure for assessing and mitigating risks around external speakers, whilst maintaining the School's existing duty to promote freedom of speech;
- The [Dignity at Work and Study Policy and Procedure](#), which requires all staff and students to challenge any prejudice, discrimination, or extremist views, including derogatory language, and which provides a procedure by which these kinds of unacceptable behaviours should be dealt with;

- The [Equality, Diversity and Inclusion Policy](#), which sets out the responsibilities of all School staff and students in relation to supporting an environment of equality, diversity and inclusion.

Roles and Responsibilities

The **Designated Safeguarding Officer for the School is the Director of Widening Participation**. This Officer is responsible for:

- Overseeing and managing the School's Safeguarding Policy and Procedure, including its application to the Prevent duty;
- Ensuring this Policy and Procedure is easily accessible to staff and students, and that appropriate School staff are provided with information, advice and training about safeguarding;
- Ensuring that this Policy and Procedure and any safeguarding training is implemented;
- Ensuring that this Policy and Procedure is monitored and reviewed in accordance with relevant changes in legislation and guidance on the protection of children, and on radicalisation;
- Establishing and maintaining contacts with appropriate external bodies, such as DfE Prevent coordinators, local authorities and the Police.

All staff and students are responsible for reporting any concerns about safeguarding individuals or radicalisation to the Designated Safeguarding Officer, where they are unavailable, to the Deputy Designated Safeguarding Officer

The **Deputy Designated Safeguarding Officer for the School is the Director of Admissions and Student Support** and will support the Designated Safeguarding Officer in conducting their responsibilities, for example through standing in for the Designated Safeguarding Officer when they are unavailable.

The **Director of Careers and Networks** is responsible for ensuring that approved internship providers have robust Safeguarding policies and procedures in place.

Any breaches of this Policy and Procedure and/or allegations of misconduct concerning children or vulnerable adults may result in the School invoking its disciplinary procedures in respect of staff or students.

In accordance with the statutory guidance set out in [Keeping Children Safe in Education \(2018\)](#), should staff have concerns about safeguarding practices within the School, they will be encouraged to present concerns to senior management. Should staff feel unable to raise an issue with senior managers, they will be encouraged to use the [NSPCC Whistleblowing Advice Line](#).

Children and Vulnerable Adults

Organising Activities

The School is committed to widening participation in higher education, and as such encourages activities that engage children to this end. This Policy and Procedure sets out how the School seeks to protect children and vulnerable adults to keep them safe from harm when in contact with School staff or students.

Any staff member or student who intends to work with children or vulnerable adults must ensure that they understand the implications of this Policy and Procedure ahead of time.

The relevant Head of Department must ensure that a risk assessment is completed before any new or changed programme, event, visit or any other activity involving children or vulnerable adults. This is an opportunity to mitigate or remove any potential risks and to consider alternative working practices. This risk assessment should consider all aspects of health and safety and safeguarding. If the activity is in conjunction with another organisation, there must be a written agreement as to whose responsibility it is to undertake the risk assessment.

Copies of the risk assessment template can be found in the School's [Health and Safety Policy](#). The Director of Finance and Operations will provide any required support on risk assessment.

Where photographs are taken of children involved in widening participation activities on or off campus, permission must be sought from them, and, where relevant, their parents or carers before they are used.

The School will be registered with the [Disclosure and Barring Service \(DBS\)](#) and will ensure that any member of staff or student who will be undertaking regulated activity will be required to undertake an enhanced [DBS](#) check. Regulated activity in relation to children is defined as contact which is: unsupervised and once a week or more, or 4 days in any 30 day period, or overnight, and in a specific role or in a specified place. The specific roles most likely to be undertaken by School staff or students are teaching, training, instructing, and providing advice or guidance to children. Specified places most likely to be visited by School staff or students are schools and colleges. Further information relating to [DBS](#) checks are contained later in this Policy and Procedure (*Employment of Ex-Offenders*).

Procedure for Raising Concerns

Staff and Students

Concerns for the safety and wellbeing of children or vulnerable adults could arise in a variety of ways, for example:

- A child or vulnerable adult may report or exhibit signs of abuse;

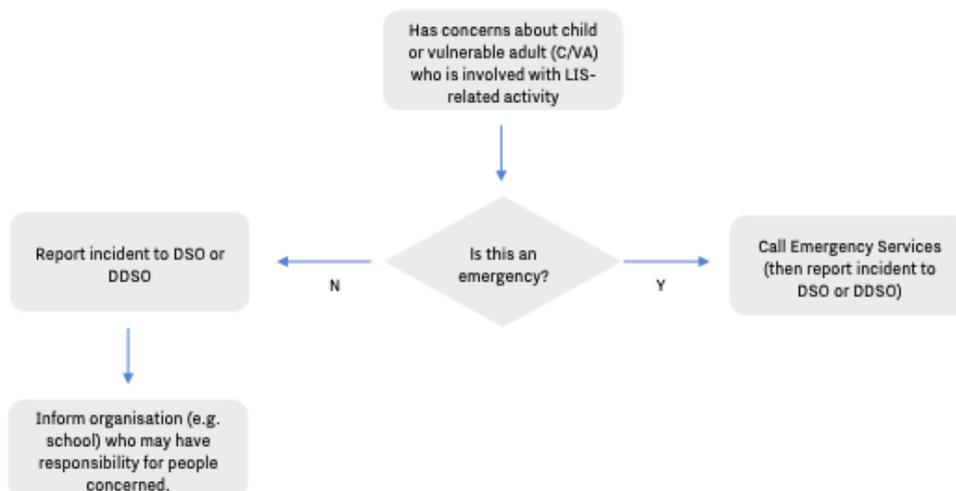
- An individual may hint that a child or vulnerable adult is at risk;
- An individual may hint that a colleague or student is an abuser;
- A staff or student may witness abuse of a child or vulnerable adult during the discharging of the School activities;
- A staff or student may witness or hear about abuse in another organisation.

If a child or vulnerable adult comes to a School member of staff or student with a report of abuse, the staff-member or student should do the following:

- Listen carefully and stay calm;
- Reassure the individual that what they have reported will be dealt with;
- Keep questions to an absolute minimum, and not interrogate the individual. Any questions should be about any immediate health and safety concerns;
- Explain to the individual that they will need to report the matter to the School's Designated Safeguarding Officer as outlined below;
- Make a full record of what was said and what the staff-member or student has done as a result, using the Safeguarding Referral form in Annex 1;
- Report the matter immediately to the School's Designated Safeguarding Officer.

Where a staff member or student has any concern about the safety or wellbeing of a child or vulnerable adult, whether or not that child or vulnerable has raised an issue with them directly, they must raise it with the Designated Safeguarding Officer (DSO), (or, where the DSO is not available, the Deputy Designated Safeguarding Officer (DDSO)), using the Safeguarding Referral Form in Annex 1. Where it is an emergency and the staff member or student has a concern about the individual's immediate safety, they should call the Police in the first instance, before informing the DSO or DDSO. The Designated Safeguarding Officer will determine whether to refer the concern to the appropriate local Children's Social Care Services and/or the Police for them to consider what, if any, further action should be taken.

Exhibit 1: Procedure for LIS staff to report concerns about the safety/wellbeing of a child or vulnerable adult



N.B. At any stage, advice can be sought directly from the NSPCC helpline on 0808 800 500

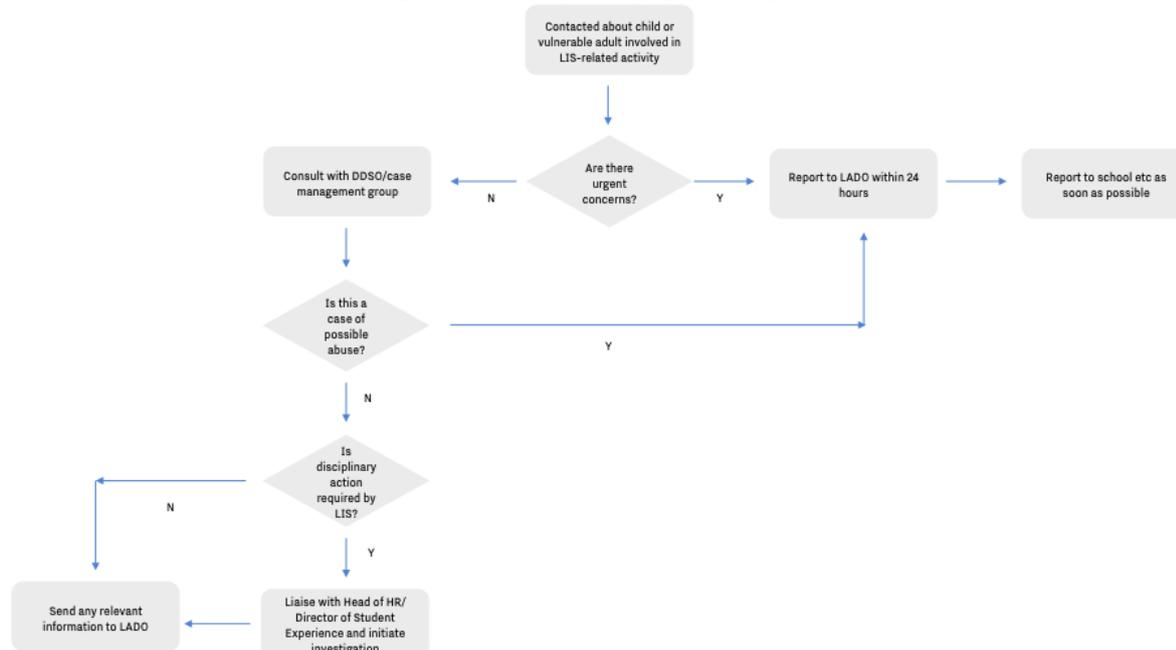
Designated Safeguarding Officer (or Deputy DSO)

Where the School Designated Safeguarding Officer (DSO) or Deputy Designated Safeguarding Officer (DDSO) receives a safeguarding concern, s/he will limit their enquiries to that necessary to undertake a risk assessment and:

- (a) Address any serious and immediate risk to the child or vulnerable adult.
- (b) Preserve any evidence likely to be lost before external agencies can respond.
- (c) Determine the appropriateness of a referral to Social Care Services, the Police or another appropriate agency and provide sufficient information to the relevant external agency to enable an effective response.
- (d) Determine any further School procedures which should be invoked.
- (e) Identify any internal support required by the child or vulnerable adult.

Where the DSO, deems that a referral to an external agency is appropriate, they will do so. The DSO will record all information and actions taken in the Safeguarding Referral Form (Annex 1). Personal data will be handled in line with the School's Safeguarding Privacy Notice (Annex 3).

Exhibit 2: DSO/DDS0 Reporting Procedure for Safeguarding children or vulnerable adults



N.B. At any stage, advice can be sought directly from the NSPCC helpline on 0808 800 500

Allegations involving a member of School staff or student

Where the allegation involves a School member of staff or student, the School has a duty of care both to the child or vulnerable adults concerned, and to the member of staff or student against whom the allegation is made. Therefore School staff or students who are the subject of allegations of this kind of misconduct will be entitled to be accompanied by any meetings held by the School whether under the disciplinary procedure or otherwise.

Where the allegation involves a member of staff, the Designated Safeguarding Officer will initiate disciplinary procedures as appropriate, which are set out in the School's Staff Handbook. Where the allegation involves a student, the Designated Safeguarding Officer will initiate student disciplinary procedures as appropriate, which are set out in the [Student Code of Conduct and Disciplinary Procedure](#).

Where a member of staff or student is working on behalf of the School with children or vulnerable adults, the allegation should also be reported using the organisation's safeguarding procedure.

The School is required to report to a range of external bodies, such as the [Disclosure and Barring Service \(DBS\)](#), should a staff member or student leave the School through reasons of misconduct or unsuitability to work with children or vulnerable adults. It is the responsibility of the Designated Safeguarding Officer to make these reports. Additionally, liaison with and referral to external agencies such as Children's Services, Social Services and/or the Police may be required. In these instances, the School and its Designated Safeguarding Officer, will follow the statutory guidance set out in [Working Together to Safeguard Children \(2018\)](#).

Historical abuse

Staff members or students may disclose that they were the subject of historical abuse by an individual unconnected with the School. Where such allegations raise concerns that other children or vulnerable adults may be at risk, the School may have an obligation to share this information with the relevant authorities. As with other safeguarding concerns, any such allegations should be raised with the Designated Safeguarding Officer (or where they are unavailable, the Deputy Designated Safeguarding Officer), who will determine the appropriate course of action. Where an allegation of historical abuse does not raise concerns about risks facing other children or vulnerable adults but the individual still wishes to report it, the Designated Safeguarding Officer will provide appropriate advice and support.

Where an allegation of historical abuse is made against a member of staff or student of the School, the Designated Safeguarding Officer will make a referral to the local Children's Social Care Services and/or the Police where there is a significant risk of harm to a child or vulnerable adult, as well as take steps to initiate the relevant staff or student disciplinary procedure, where appropriate.

Internships

When vetting an employer as a potential internships provider, the Director of Careers and Networks or her nominee will ensure that the employer has robust Safeguarding policies and procedures; the name of the Designated Safeguarding Officer(s) at the employers will be recorded in the internships database for ease of reference should a safeguarding issue arise.

Radicalisation

Procedure for raising concerns

Staff and Students

Radicalisation can take place face-to-face or online. Whilst the risk of radicalisation is relatively low, a small number of students may be vulnerable to a range of radicalising causes, including religious radicalisation, far-right politics or animal rights extremism. Whilst children and vulnerable adults may be most at risk of radicalisation, students and staff who do not fall into these categories may also be at risk.

There is no set pattern to radicalisation, but there are some changes in behaviour that may prompt concerns that an individual is at risk of being radicalised, including:

- Noticeable changes in peer group or religious practices;
- Sudden or increased isolation from family/social group;
- Indication of the vulnerable person being insistently befriended by individuals or groups with radical views;
- Use of extremist or hate terms to exclude others or incite violence;
- Extremist political activism or the accessing, possession or distribution of materials advocating extremist views;
- An undertone of grievance or “us and them” language or behaviour;
- Increased emotional instability, and/or cultural or social anxiety;
- Possession of suspicious items (e.g., large amounts of money, multiple passports, unusually large amounts of everyday items that could be used to make incendiary devices).

There may be many reasons for such changes other than potential radicalisation, which is why a safeguarding approach should be adopted, as this enables the relevant services within and outside the School to identify the individual’s needs and vulnerabilities.

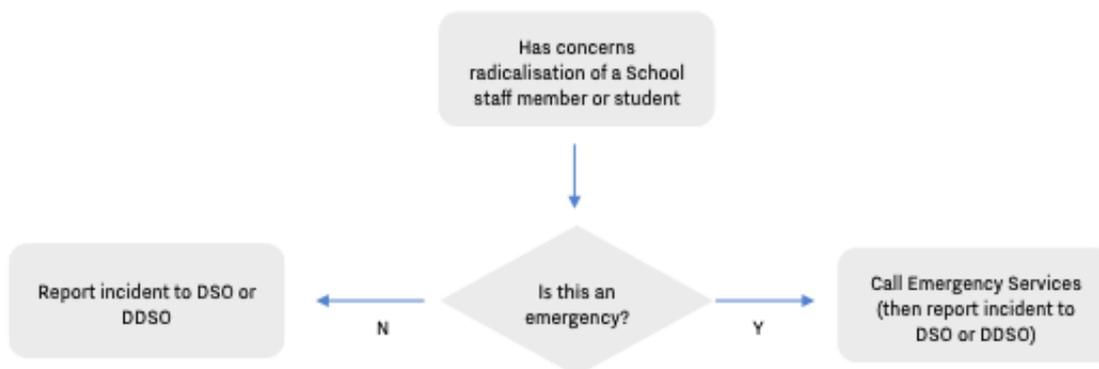
The procedure for School staff or students to report any concerns about radicalisation is the same as the procedure for reporting any safeguarding concerns relating to children or vulnerable adults (as set out above).

Where a staff member or student has concerns relating to the radicalisation of an individual, they should, where appropriate, first check their concerns, either with others who might have noticed something (such as colleagues or academic tutors), or speak to the person directly. Where concerns persist, the staff member or student should raise their concerns with the Designated Safeguarding Officer (DSO) (or, where they are not available, the

Deputy Designated Safeguarding Officer (DDSO)), using the Prevent Referral Form in Annex 2. Any staff or student suspecting an immediate threat to any individual or property should notify the Police and School Security, before raising their concerns with the DSO or DDSO.

The Designated Safeguarding Officer will assess the concerns raised and determine whether to make an external referral to the School's Prevent partners, local authorities or the police. All concerns raised will be treated securely, sensitively, and, so far as is possible, confidentially, in line with the Safeguarding Privacy Notice (Annex 3)

Exhibit 3: Procedure for LIS staff to report concerns about radicalisation

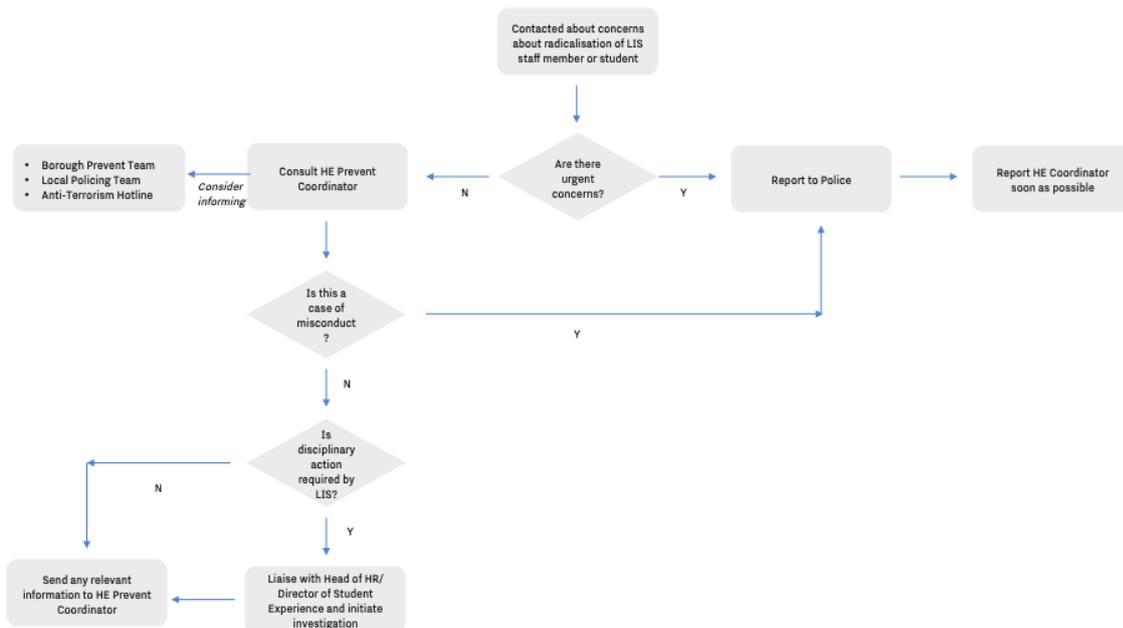


Designated Safeguarding Officer or Deputy DSO

Where the School Designated Safeguarding Officer or Deputy Designated Safeguarding Officer receives a radicalisation concern, s/he will:

- (a) Address any serious and immediate risk.
- (b) Determine the appropriateness of a referral to the HE Prevent Coordinator, the Borough Prevent Team, the Anti-Terrorism Hotline, the Police or another appropriate agency, and provide sufficient information to the relevant external agency to enable and effective response.
- (c) Determine any further School procedures which should be invoked.
- (d) Identify any internal support required the individual concerned.

Exhibit 4: DSO/DDSO Reporting Procedure for Prevent



The DSO will record all information and actions taken in the Prevent Referral Form (Annex 2).

Allegations involving a member of School staff or student

Where concerns have been raised about the radicalisation of a School staff member or student, the Designated Safeguarding Officer, in addition to following the procedure above, will liaise with the Head of Human Resources (where the individual is a staff member) or the Director of Admissions and Student Support (where the individual is a student) to ensure that the individual concerned is receiving the support and guidance they require.

Where a concern of radicalisation is linked to act of alleged misconduct (e.g., a breach of the [Dignity at Work and Study Policy and Procedure](#)), the Designated Safeguarding Officer will initiate the relevant disciplinary proceedings as set out in the Staff Handbook or the [Student Code of Conduct and Disciplinary Procedure](#).

Records and Data Protection

The DSO and DDSO will take care to respond to all cases of suspected abuse and radicalisation with speed, sensitivity, and professionalism. S/he will take full, accurate and records of concerns, allegations, referrals, and reasons for actions. These records will be stored electronically in a secure and confidential manner on a restricted server, and in hardcopy with restricted access, in accordance with data protection regulations. Data held is retained for a specified period, and is shared on a need-to-know basis according to the [Safeguarding Privacy Notice at Annex 3](#).

Safeguarding and Prevent Training Programmes

All staff undergo Safeguarding and Prevent training as part of their full induction process. [Annex 4 sets out the School's Safeguarding and Prevent Training Programme.](#)

The Designated Safeguarding Officer (or trained external provider) leads refresher Safeguarding and Prevent training for the full staff team on an annual basis. Staff will be apprised of any relevant changes in legislation and undergo scenario-based training. The next annual Safeguarding training is scheduled for June 2020.

The specialist Safeguarding team, comprising the Designated Safeguarding Officer and the Deputy Designated Safeguarding Officer, meet on a triennial basis to review internal Safeguarding and Prevent policies and processes and to plan training needs which arise as a result.

On a rolling basis, and prior to any programme of student interactions (e.g. LIS Discovery Days), safeguarding procedures are reviewed at whole team meetings.

The Designated Safeguarding Officer will offer support and advice on any Safeguarding and Prevent questions, concerns and issues.

Policy on Employment of Ex-Offenders

Having a criminal record will not necessarily prevent an individual from working at the London Interdisciplinary School. This will depend on the nature of the position, the outcome of any [Disclosure and Barring Service \(DBS\)](#), and the circumstances and background of the offences.

The School's Policy on the Employment of Ex-Offenders applies to all staff. It aims to ensure that the School treats all applicants for jobs who have a criminal record fairly and does not discriminate unfairly against candidates with either a spent or unspent conviction, whilst safeguarding the School, its staff, students, applicants, and visitors. It sets out the basis on which the School will seek information from prospective employees about past spent and unspent convictions, and the way in which it will deal with information relating to offences.

Legislative Context

The purpose of this Policy is to ensure that the School complies fully with the provisions of the [Rehabilitation of Offenders Act 1974](#) and best practice, in the recruitment of job applicants with a criminal record. This Policy has also been drawn up in the context of the [Safeguarding Vulnerable Groups Act 2006](#), which sets out the School's responsibilities to safeguard children and vulnerable adults.

Roles and Responsibilities

Managers are responsible for identifying the need for a [Disclosure and Barring Service \(DBS\)](#) check and making the necessary request to the Human Resources Department.

The *Human Resources Department* is responsible for managing the process of requesting a check, notifying managers of the outcome and managing relevant documentation in line with the School's [Data Retention Policy](#) and [Detailed Data Retention Schedule](#).

Employees are responsible for complying with this Policy and providing all the relevant information.

Principles

[The Rehabilitation of Offenders Act 1974](#) was introduced to ensure that ex-offenders who have not re-offended for a specified period of time since their date of conviction are not discriminated against when applying for jobs.

The Act enables ex-offenders to “wipe the slate clean”, insofar that, unless the job they are applying for is exempted, they are no longer required to disclose to organisations convictions that are spent. It is unlawful for an organisation to discriminate against an ex-offender on the basis of a spent conviction unless they are applying for an exempted job. Unspent convictions must still be disclosed.

The length of time required for a conviction to become spent depends on the sentence received and the age when convicted.

There are, however, certain jobs that are exempt from the Act in order to protect vulnerable groups. These include jobs that involve unsupervised access to children, young people, the elderly, disabled people, alcohol and drug users, and the chronically sick. Where a post at the School falls into this category, it will be subject to additional checks on the history of applicants to assess their suitability.

[Disclosure and Barring Service \(DBS\): Levels of Disclosure](#)

There are three levels of disclosure under the [Disclosure and Barring Service \(DBS\)](#).

Basic Disclosure is the lowest level of disclosure and provides information from the Police National Computer for details of all current criminal convictions (convictions considered unspent under the [Rehabilitation of Offenders Act 1974](#)). It discloses all such convictions, or states that there are none. A Basic Disclosure is available for any position and can be obtained for any purpose.

Standard Disclosure provides details of both spent and unspent convictions, and cautions, formal reprimands and final warnings held on the Police National computer. It also states if there is nothing on record. If the applicant is applying for a post working with either children or vulnerable adults, the disclosure will also show whether a person is banned from working with either group.

Enhanced Disclosure contains the same details as the Standard Disclosure, but may also contain non-conviction information from local police records, which the police may think is relevant to the position being sought. It also states if there is nothing on record. The Enhanced Disclosure is available for positions involving regular caring for, or training, supervising or being in sole charge of children or vulnerable adults. This level of disclosure is also available for certain statutory licensing purposes.

Policies

As is set out in the School's [Equality, Diversity and Inclusion Policy](#) and in line with the [Equality Act 2010](#), the School is committed to the fair treatment of all of its staff, students and applicants, and no individual will be unjustifiably discriminated against on the basis of gender, race, nationality, ethnic or national origin, religious or political beliefs, disability, marital status, family circumstance, sexual orientation, spent criminal convictions, age or for any other reason.

The School actively promotes equality of opportunity for all with the right mix of talent, skills and potential, and welcomes applications to work at the School from a wide range of candidates, including those with criminal records. The School selects all candidates for interview on the basis of their aptitude, skills, qualifications and experience in relation to the requirements of the post.

For the majority of staff posts, the School will only ask about unspent convictions as defined by the [Rehabilitation of Offenders Act 1974](#). However, where the post involves contact with children or vulnerable adults and in certain other cases, the School is entitled to make enquiries about the applicant's entire criminal record and will seek a disclosure through the DBS.

Disclosures through the [Disclosure and Barring Service](#)

This Policy on the recruitment of ex-offenders will be made available to all disclosure applicants at the outset of the recruitment process.

As an organisation using the DBS disclosure service to assess applicants' suitability for positions of trust, the School commits to complying fully with the [DBS Code of Practice](#) and undertakes to treat all applicants for posts or programmes of study fairly. It undertakes not to discriminate unfairly against any subject of a disclosure on the basis of convictions or other information revealed.

A DBS check is only requested when it is both proportionate and relevant to the position concerned. For those positions where a DBS check is required, all application forms, job adverts and job specifications will contain a statement that this a DBS check will be requested in the event of the individual being offered the position.

Where a DBS check is to form part of the recruitment process, the School encourages all applicants called for interview to provide details of any criminal record at an early stage in

the application process. The School guarantees that this information is only be seen by those who need to see it as part of the recruitment process.

The School will ensure that all those who are involved in the recruitment process will have suitable guidance to enable them to identify and assess the relevance of the offence in relation to the position applied for. The School will also ensure that they receive appropriate guidance on the relevant legislation relating to the employment of ex-offenders, such as [The Rehabilitation of Offenders Act 1974](#) and the [Safeguarding Vulnerable Groups Act 2006](#).

At interview or in a later separate discussion, the School will ensure that an open and measured discussion takes place on the subject of any offences or other matter that might be relevant to the position. Failure to reveal information that is directly relevant to the position applied for could lead to withdrawal of an offer of employment. Action may also be taken, under the appropriate procedures, against an existing employee, where it is discovered that he or she has failed to reveal information directly relevant to the position held.

The School undertakes to discuss any matter revealed in a DBS check with the person seeking the position before withdrawing a conditional offer of employment.

The School will make every subject of a DBS check aware of the existence of the [DBS Code of Practice](#) and make a copy available on request.

Procedures

All job applicants – declaration of unspent convictions

All job applicants will be informed that if they are offered employment with the School, relevant unspent criminal convictions and associated information will need to be submitted (see Exhibit 5 below).

Exhibit 5—Relevant and unspent convictions

Relevant offences

A relevant offence includes one or more of the following:

- a) Any kind of violence including (but not limited to) threatening behaviour, offences concerning the intention to harm, or offences which resulted in actual bodily harm;
- b) Sexual offences, including those listed in the [Sexual Offences Act 2003](#);
- c) The unlawful supply of controlled drugs or substances where the conviction concerns commercial drug dealing or trafficking (drug offences only involving possession are not relevant offences);
- d) Offences involving firearms;
- e) Offences involving arson;
- f) Offences involving terrorism.

If an applicant was convicted outside the UK for an offence listed above, this is also considered a relevant offence. Cautions, reprimands and final warnings are categorised as convictions. Public notices for disorder (PNDs) and Anti-Social Behaviour Orders (ASBOs) are not convictions, unless an

applicant has contested a PND or breached the terms of an ASBO/other order and this has led to a criminal conviction.

Unspent convictions

A criminal conviction is “spent” after a certain period of time. This period is defined by the [Rehabilitation of Offenders Act 1974, and depends on the court’s sentence following conviction.](#) Sentences of over 4 years in prison cannot become spent; most cautions, reprimands and final warnings are spent immediately. More information on offences and rehabilitation periods can be found at <https://gov.uk>.

Where a prospective employee is uncertain as to whether their conviction is spent, they should seek independent advice.

In addition, the School reserves the right to request a job applicant’s permission to undertake a Basic Disclosure to support pre-employment vetting processes.

The suitability of a person with a criminal record will vary depending on the nature of the job and the circumstances of the conviction. An assessment of the applicant’s skills, experience and the nature of the convictions should be weighed against the potential risks associated with the job.

Examples of issues that the School will consider in assessing the relevance of offences to particular jobs include:

- Whether the post involves one-to-one contact with children, staff, students or visitors;
- The levels of supervision the post holder will receive;
- Whether the post involves contact with the public;
- Whether the nature of the job will present opportunities for re-offending.

In carrying out a risk assessment the School will also take into account the following issues:

- The seriousness of the offence and its relevance to the safety of staff, students, visitors and School premises;
- The length of time since the offence occurred;
- The age of the offender when the offence occurred;
- Whether the offence was a one-off or part of a repeated pattern;
- Whether the offence has since been decriminalised;

When a decision is made not to appoint an individual after unspent criminal offences have been considered, the School will, on request, inform the individual why they were considered to be pertinent.

Following this process, if an individual is appointed and it subsequently emerges that they had an unspent conviction that was not disclosed, then this will be treated as a serious disciplinary matter and handled and investigated under the School’s Staff Disciplinary Procedure.

Exempted jobs - requirement for disclosure of spent convictions

The School will make clear when advertising a vacancy where the post is exempted from [Rehabilitation of Offenders Act 1974](#) and therefore subject to disclosure. In these circumstances the prospective employee will undergo a [DBS check](#) . For most School jobs deemed to be exempt, the level of disclosure will be Enhanced.

Where a [DBS check](#) gives information that may make the candidate unsuitable for appointment, the candidate will be invited to discuss this with the Chair of the interview panel and/or a member of Human Resources before a final decision regarding the appointment is made.

If the candidate is deemed unsuitable for appointment, the candidate will be informed of the reasons for this in writing and the offer of the post will be withdrawn.

Only convictions that are relevant to the person's suitability to perform the job in question will be considered.

Storage of Data Relating to Disclosures

In handling, storing, retaining and disposing of information relating to Disclosures, staff must comply with the [DBS Code of Practice](#), as well as with the [GDPR](#), the School's [Data Retention Policy](#) and its [Detailed Data Retention Schedule](#).

Existing staff with a criminal record

Where the School has to obtain a Disclosure in relation to existing staff and this process reveals a criminal history, the School will assess whether or not this prevents them continuing in their present job, or moving to another job. In carrying out this assessment the School will have regard to the considerations relating to the job and offence as set out above (*All job applicants—declaration of unspent convictions*).

In circumstances where, after an appropriate assessment is carried out, it is deemed that they cannot continue in their present job, then the School will examine re-deployment possibilities.

The Head of Human Resources will ensure that all staff involved in leading the recruitment and selection of staff are made aware of the School of this policy and its provisions.

Safeguarding and Extenuating Circumstances

Where a Safeguarding concern arises in relation to a student, who is about to take an examination or submit an assessment, the Designated Safeguarding Officer will, with the consent of the individual, apply to the Director of Teaching and Learning for a deferral or extension. In these circumstances, the Designated Safeguarding Officer will not disclose any details in relation to the Safeguarding issue, but will simply flag that there is an issue. The Director of Teaching and Learning will, wherever practicable, allow the deferral or extension.

Where a Safeguarding issue arises in relation to a student and there is evidence that it has adversely affected their attendance or completion of or performance in an examination or assessment, the Designated Safeguarding Officer will, with the consent of the individual, support an academic appeal to the Registrar on the basis of Extenuating Circumstances. This appeal will then be dealt with in line with the School's [Academic Appeals Procedure](#). The student will not be required to submit details of the Safeguarding issue; the Registrar and Academic Appeals Board will take as sufficient evidence of Extenuating Circumstances the statement of the Designated Safeguarding Officer that there is a safeguarding issue.

Mental Health Welfare

We recognise that there will be times when concerns arise in relation to the mental health welfare of a student or prospective student. This may not technically fall under the legal definition of Safeguarding, nonetheless it may be a cause for serious concern. Where a member of staff or student has a concern of this type relating to either another student or a prospective student (e.g., via a School visit), they should contact the Designated Safeguarding Officer and state their concern. The Designated Safeguarding Officer will determine the best course of action to raise the concern sensitively with a responsible individual. For example, where concerns relate to the mental health welfare of a student, the DSO will contact the Director of Admissions and Student Support. Where they relate to a child or young person at a School Visit or Open Day (Discovery Day), the DSO may contact the individual's School.

Reporting: Key Contacts

LIS Designated Safeguarding Officer (DSO): Dr. Michael Englard (Director of Widening Participation)

Contact: 07762 266631; michael@t-lis.org

LIS Deputy Designated Safeguarding Officer (DDSO): Hannah Kohler (Director of Admissions and Student Support)

Contact: 07717 873124; hannah@t-lis.org

Local Authority Designated Officers (LADO): Verlyn Munro

Phone: 0207 364 0677

Emergency Duty Team

Phone: 020 7364 4079 (out of office hours)

Tower Hamlets Multi-Agency Safeguarding Hub (MASH)

020 7364 3009; Mash@towerhamlets.gov.uk

FE/HE Regional Prevent Coordinator for London: Jake Butterworth

Contact: 07795 454722; jake.butterworth@education.gov.uk

Tower Hamlets Prevent Education Officer (Schools, Colleges and Training): Tom Llewellyn-Jones

Contact: 020 7364 6476; Thomas.llewellyn-jones@towerhamlets.gov.uk

Local Policing Team: phone 101

Anti-Terrorist Confidential Hotline: 0800 789 321

Home Office [online form](#) for reporting online terrorism.

Monitoring and Review

The Designated Safeguarding Officer will review this Policy and Procedure annually in collaboration with the Deputy Designated Safeguarding Officer and the Equality, Diversity and Inclusion Steering Group (EDISG). This review will take into consideration any relevant changes in legislation and guidance on safeguarding and radicalisation.

Any agreed changes must be submitted to the Board of Directors for authorisation. As part of its annual review of this Policy and Procedure, the Board of Directors will assess the extent to which it strikes the appropriate balance between the competing duties of preventing individuals being drawn into terrorism and upholding academic freedom and freedom of speech; and will authorise any further changes accordingly.

The Designated Safeguarding Officer will submit an annual report to the Board on statistical information about the number of safeguarding concerns that have been raised, and how they were resolved.

Annex 1: Safeguarding Referral Form

Personal Details (Child/Vulnerable Adult)

Name

Date of Birth

Contact details

Who has parental responsibility?

Person reporting incident

Name

Position

Contact details

Incident details

Date and Time

Location

Nature of concern/allegation

Observations (Describe what you have seen/heard or what the person reporting the incident has seen or heard)

What was said (Record exactly what the child/vulnerable adult said and what you said. Do not lead the child/vulnerable adult).

Action taken

Initial action

Views of child/vulnerable adult

School etc informed

Date and Time

Name(s)

Contact details

Details of discussion

Other staff informed

Date and Time

Name(s)

Contact details

Details of discussion

External agencies informed

Date and Time

Name(s)

Contact details

Details of discussion

Form completed by

Name

Signed

Date

If the incident has been reported to one of the agencies above then a copy of this form must be sent within 24 hours of the telephone report

Annex 2: Prevent Referral Form

Personal Details (about person deemed potentially at risk of radicalisation)

Name

Date of Birth

Contact details

Role/position (Staff/Student)

Person reporting incident

Name

Position

Contact details

Incident details

Date and Time

Location

Nature of concern/allegation

Observations (Describe what you have seen/heard or what the person reporting the incident has seen or heard)

What was said (Record exactly what the individual at potential risk of radicalisation said and what you said).

Action taken

Initial action

Views of individual deemed at risk of radicalisation

Other staff informed

Date and Time

Name(s)

Contact details

Details of discussion

External agencies informed

Date and Time

Name(s)

Contact details

Details of discussion

Form completed by

Name

Signed

Date

If the incident has been reported to one of the agencies above then a copy of this form must be sent within 24 hours of the telephone report

Annex 3: Safeguarding Privacy Notice

Scope

This Privacy Notice sets out what we do with your personal data when safeguarding concerns are reported to us. It applies to you if you report a safeguarding concern, if a safeguarding concern is reported about you, or a safeguarding concern is reported where you are at risk.

Who we are

The London Interdisciplinary School (LIS) is the data controller in relation to the processing activities described below. This means that The London Interdisciplinary School decides why and how your personal information is processed. Where this policy refers to “we”, “our” or “us” below, unless it mentions otherwise, it’s referring to The London Interdisciplinary School.

What information do we collect about you, and how do we collect it?

If information is brought to the attention of a member of LIS staff about a potential safeguarding risk, that member of staff is obliged to notify the Designated Safeguarding Officer or Deputy Designated Safeguarding Officer. This could include the name of the person identifying the issue, the names of the individuals potentially at risk, and the name of the person they are at risk from, as well as details of personal circumstances which relate to the safeguarding concern. This information may include “special category” data, for example, about health or disability, sexual life or sexual orientation.

How do we use your personal information?

We use this information to assess whether there is a safeguarding risk, and if there is any action that we need to take to keep individuals safe. This is a statutory and legal obligation informed by legislation including [Keeping Children Safe in Education 2016](#) and [The Care Act 2014](#). The condition for processing special category data for this purpose would be that it is in the substantial public interest, for the purposes of protecting an individual from harm (see [Safeguarding amendment to Data Protection Bill](#)). We also keep statistical information about the number of safeguarding concerns that have been raised, and how they were resolved. This is in our legitimate interest to plan our services.

Who do we share your information with?

We will share information with police forces, and government agencies, where we deem it necessary to protect an individual. This is a legal and moral obligation. We may use third party suppliers and service providers for the provision of, for example, specialist safeguarding advice. When we use third party service providers, we only disclose to them any personal information that is necessary for them to provide their service. We have a contract in place that requires them to keep your information secure and not to use it other than in accordance with our specific instructions. Disclosure to a third party request for safeguarding-related information may be necessary, where LIS knows of any reason why, for example, a student or alumni may not be suitable to work with children under the age of 18 or vulnerable adults.

Do we transfer information outside the European Economic Area (EEA)?

Information you provide to us is stored on our secure servers, or on our cloud based systems which are located within the EEA. We will not transfer your data outside the EEA.

How long do we keep your personal information for?

The Safeguarding Team, which is the Designated Safeguarding Officer and Deputy Designated Safeguarding Officer, keep safeguarding concerns for three years from the date of case closed, if we decide they are not necessary to act on, and for 25 years if we do act on them.

Your rights

You have a number of rights in relation to your personal information, which apply in certain circumstances under the [General Data Protection Regulations \(GDPR\)](#) and are set out in our [Data Protection Policy](#). To exercise any of these rights, please contact us using the details below.

You have the right:

- To access your personal information that we process
- To rectify inaccuracies in the personal information that we hold about you

In some circumstances, you also have the right:

- To have your details removed from systems that we use to process your personal data
- To restrict the processing of your personal data in certain ways
- To obtain a copy of your personal data in a structured electronic data file
- To object to certain processing of your personal data by us
- To request that we stop sending you direct marketing communications.

If you are concerned about the way we have processed your personal information, you can complain to the [Information Commissioner's Office \(ICO\)](#).

Contact us

If you have any queries about safeguarding at LIS, please contact the Designated Safeguarding Lead at michael@t-lis.org

LIS has a nominated Data Protection Officer, who is the Registrar. If you have any queries about this privacy notice or about the way we process your personal information, please use the contact details below:

data-protection@open.ac.uk

The Data Protection Officer,

The London Interdisciplinary School

X + why

20-30 Whitechapel Road

London

E1 1EW

United Kingdom.

Annex 4: Safeguarding and Prevent Training Programme

All staff undergo Safeguarding and Prevent training as part of their full induction process.

The Designated Safeguarding Officer (or trained external provider) leads refresher Safeguarding and Prevent training for the full staff team on an annual basis. Staff will be apprised of any relevant changes in legislation and undergo scenario-based training. The next annual Safeguarding training is scheduled for June 2020 and will incorporate the Home Office WRAP training.

The specialist Safeguarding team, comprising the Designated Safeguarding Officer and the Deputy Designated Safeguarding Officer, meet on a triennial basis to review internal Safeguarding and Prevent policies and processes and to plan training needs which arise as a result.

On a rolling basis, and prior to any programme of student interactions (e.g. LIS Open Days, or “Discovery Days”), safeguarding procedures are reviewed at whole team meetings.

Safeguarding Programme: Key Dates

Annual Whole Team Refresher Training (Safeguarding and Prevent)	June 2020
Triennial Review: (Lead Safeguarding Team)	October 2019
Triennial Review (Lead Safeguarding Team)	January 2020
Triennial Review (Lead Safeguarding Team)	May 2020

Name of policy/procedure: Safeguarding Policy and Procedure (including Prevent)

Document owner: Hannah Kohler, Director of Admissions and Student Support

Date Originally Created: 01/2019

Last reviewed: 12/2019

Reviewed by: Dr. Michael England (Director of Widening Participation), Academic Council

Audited by: Academic Council

Date of Audit: 12/2019

Date of next review: 12/2020
(annually unless otherwise agreed)

Related documents: Equality, Diversity and Inclusion Policy
(eg associated forms, underpinning Dignity at Work and Study Policy and Procedure processes, related policies or overarching Academic Freedom Policy policies) Code of Practice on Freedom of Speech Staff Handbook Student Code of Conduct and Disciplinary Procedure Staff Training Programmes and Logs

Version Control			
Version	Author	Date	Brief summary of changes
1	Hannah Kohler (Director of Admissions and Student Support)	13/01/2019	Original draft
2	Dr. Michael England (Director of Widening Participation)	14/03/2019	Updated to reflect Designated Safeguarding Lead training, including references to statutory and non-statutory guidance including "Working Together to Safeguard Children (2018)"
3	Dr. Michael England (Director of Widening Participation)	25/06/2019	Added detail on Safeguarding and Prevent training. Included detail and schematics for

			Safeguarding referral. Included reference to Deputy Designated Safeguarding Officer. Included reporting contacts. Added Safeguarding referral form.
4	Hannah Kohler (Director of Admissions and Student Support)	26/06/2019	Combined Safeguarding and Prevent policies and procedures into a single document. Included detail and schematics for Prevent referral. Added Prevent referral form.
4	Hannah Kohler (Director of Admissions and Student Support)	26/06/2019	Improved detail on data section. Included Employment of Ex-Offenders Policy & DBS Procedures. Included section on Extenuating Circumstances
5	Hannah Kohler (Director of Admissions and Student Support)	27/06/2019	Included Safeguarding Privacy Notice.
6	Dr. Michael Englard (Director of Widening Participation)	27/06/2019	Minor wording changes
7	Hannah Kohler (Director of Admissions and Student Support)	01/08/2019	Added section on mental health welfare
8	Hannah Kohler (Director of Admissions and Student Support)	04/11/2019	Included internships into scope of Safeguarding policy. Minor wording changes; removal of training log.
9	Academic Council	18/12/2019	Approved