

## **SAFEGUARDING POLICY**

### **CONTEXT STATEMENT**

**Global London College does not recruit students under the age of 18. As such this policy refers to the college's approach to safeguarding potentially vulnerable adults.**

### **PURPOSE**

The purpose of this document is to specify the policy of Global London College for the safeguarding of adults who may be considered susceptible to abuse of any form. Global London College aims to take all reasonable steps in relation to the safety and welfare of all vulnerable groups during its operations. The College does not tolerate the abuse, deliberate harm and neglect occurring on its premises.

This Policy is based on and incorporates elements of the following legislation and national guidance documents (including but not limited to):

- Safeguarding Vulnerable Groups Act 2006
- Modern Slavery Act 2020
- Protection of Freedoms Act 2012
- Disclosure and Barring Service Guidance documents and should be read in conjunction with the Fitness to Practise Policy, Confidentiality and Data Protection Act, The Prevent Duty Policy, Misconduct and Disciplinary Policies and Procedures.

### **SCOPE**

This Policy applies to all members of staff, students, visitors, and volunteers during their duties within or outside Global London College premises engaged in regulated activity relating to adults or may have contact with vulnerable groups.

This includes registered students within or outside the premises (including work-based and placement learning, visits etc) regardless of their mode of study and irrespective of whether a matter arises during term time or vacation. The overwhelming majority of students attending the college are overseas residents and attending the college on a Study Visa.

As such we recognise that students from abroad and residing in the UK may become vulnerable due to circumstances including; financial pressures, accommodation difficulties, relationship and family issues, visa issues, cultural and religious issues and threat of modern slavery.

### **DEFINITIONS**

**Regulated activity relating to adults:** In the context of the college, this includes regular unsupervised contact with adults over 18 such as; supervising; providing advice and

guidance on well-being; includes pastoral care in relation to assistance with general and sometimes personal matters and/or in the conduct of the adult's own affairs.

**Vulnerable adult:** An adult who receives regulated activity is considered vulnerable at the time he or she requires that regulated activity, regardless of the setting or the personal circumstances of the adult receiving the activity. Other factors that contribute to the vulnerability of students may include physical and learning disabilities, social exclusion, underachievement, recent religious conversion, rejection by peers, faith, social groups or family, victim or witness to race or religious hate crime, family conflict and identity confusion. Some of these factors may result in a recent change in appearance and or behaviour. A vulnerable adult is also prone to being influenced by others to engage in acts of violence or terrorism through radicalisation.

**Types of Abuse or Harm that may be experienced by a Vulnerable Adult:** Types of abuse or harm that vulnerable adults /adults at risk (adults with care and support needs) may encounter may include:

**Emotional/ Psychological:** Action or inaction by others that causes mental anguish or severe adverse effects on the emotional development of the adult at risk.

**Physical:** any intentional physical contact that results in discomfort, pain or injury including fabricating symptoms or deliberately inducing illness to an adult at risk.

**Sexual:** including any form of sexual activity with an adult at risk or coercion or force to take part in sexual acts including non-contact abuse or being forced to watch inappropriate images and/ or use of the internet/ technology.

**Neglect:** Failure to identify and/or meet care needs or adequate supervision; failure to act or omission.

**Institutional:** Maltreatment of a person from a system of power.

**Financial:** Usually associated with the misuse of money, valuables, or property

**Discriminatory abuse:** Including racist, sexist, ageist abuse based on a person's disability, and other forms of harassment, slurs, or similar treatment.

**Internet/electronic abuse:** The use of modern communication technologies (e.g. internet, text or video messaging, e-mail, chatrooms, social media networking sites or picture sites such as snapchat) to embarrass, humiliate, threaten, intimidate, or bully an individual to gain power and control over them.

The following may indicate that abuse is taking place (this list is not exhaustive):

- Unexplained or suspicious injuries, particularly if such an injury is unlikely to have occurred accidentally;
- An injury for which the adult's or carer's explanation appears inconsistent;
- The adult describes an abusive act or situation or allegation of mistreatment;
- Unexplained changes in behaviour;
- Inappropriate sexualised or risky behaviour (sexual or otherwise);
- Apparent mistrust of others;
- The adult appears increasingly unkempt.

How Global London College work can lead to contact with vulnerable adults

- Widening participation initiatives taking place in or out of the premises.
- Contact with adult students who may have been abused outside the premises.
- Placements or trials with institutions as part of professional training
- Provision of welfare and pastoral care services.
- Social activities including visits.

## **POLICY STATEMENTS**

### **1. All staff, students and volunteers who carry out regulated activity relating to adults or who may have contact with vulnerable groups;**

- Should ensure they understand the implications of this Policy before commencing any programme, event, visit or other activity and must ensure there is a risk assessment in place. Where relevant, safeguarding training should be incorporated into relevant programmes of study and/or briefings for students undertaking work-based and placement learning;
- are responsible for their actions and behaviour and should avoid any conduct which would lead any reasonable person to question their motivation and intentions;
- Should work openly and transparently with vulnerable groups;
- Should protect the welfare of vulnerable people.

All vulnerable groups, without exception, have the right to protection from abuse regardless of age, disability, gender reassignment, marriage, and civil partnership; pregnancy and maternity, race, religion and belief, sex, or sexual orientation.

### **2. Student / Employment Vetting**

All Global London College staff handling DBS disclosure information are committed to storing and handling it securely in accordance with the Data Protection Act and the DBS Code of Practice.

### **3. Dealing with Suspicions or Allegations of Abuse**

Staff, students, and volunteers who have contact with vulnerable groups have a responsibility to be alert to the possibility that an individual may have been abused or be at risk of abuse. Concerns of this nature could arise in a variety of ways and a range of settings. To identify and respond appropriately to concerns of abuse the following structures have been put in place:

#### **Class Teachers**

Class tutors are the first point of contact with students. They are required to note any changes in behaviour that may require further action. Students who wish to discuss personal issues affecting academic progress and have occurred may do so with their class teachers.

### **Student Welfare Officer**

Global London College has a designated Welfare Officer who is responsible for overseeing the management of safeguarding issues within the College. The officer responds directly to students' needs and is the first point of contact after a teacher. If the Welfare Officer is not able to respond, relevant staff members including the Principal, can receive and respond appropriately to reports of abuse within the college.

### **Safeguarding Training**

The Welfare Officer and Principal will undergo relevant safeguarding training and attend refresher training as appropriate. This may include input from Social Services (Adult Safeguarding) and/or Police, as well as input on the handling of confidential information.

### **Information Sharing and Confidentiality**

A general principle for processing information is that information is only shared with the consent of the subject of the information. In some circumstances, however, it will not be appropriate to seek consent before sharing information with others and/or information can be shared where consent has been refused. The exception to this is where to do so would place an adult or others at increased risk of significant harm; or undermine the prevention, detection or prosecution of serious crime including where seeking consent might lead to interference with any potential investigation.

### **The Reporting Process**

The Class Teacher will act as the point of contact within Global London College for receiving and recording safeguarding concerns and liaising directly with the Welfare Officer. If the student does not want to disclose information to the tutor, he/she may report directly to the Student Welfare Officer who would act accordingly. The Student Welfare should never leave a concern unreported.

The committee will need to establish facts but will not investigate allegations of abuse. Global London College has a duty of care to report any severe reports of concern, abuse, or harm to Social Services or the Police. In dealing with allegations of this nature, Global London College also recognises that it has a duty of care both to the vulnerable group concerned and (for protecting staff, and students from false or malicious allegations) to the member of staff, student, or volunteer against whom the allegation is made. Global London College will liaise with the Local Safeguarding Boards within Social services or with the Police, depending on the nature of the offence.

**Referral to the Disclosure and Barring Service (DBS)**

Global London College has a legal duty to refer individuals (whose role involves regulated activity relating to children and/or adults) to the DBS if:

They have been removed from their regulated activity role (or would have been removed if they had not left, resigned, retired or been made redundant); or have engaged in professional misconduct, or have received a caution or conviction for a 'relevant offence'.

**Annual Review:** The Student Welfare officer and Principal will liaise with Global London College Governors annually to ensure this policy and supporting procedures remain effective and relevant.

Reviewed: January 2026

Next review: January 2027