

# IBCM Safeguarding Policy

## 1. Purpose and context

- 1.1. The purpose of this policy is to outline IBCM's approach to managing and handling its responsibilities in respect of safeguarding students, staff and the wider community in institution-led activities fully, effectively and in accordance with statutory guidance and legislation.
- 1.2. It is the intention of this policy to promote high standards of personal and professional practice across the institution and outlines the procedures for staff to follow when concerns arise.
- 1.3. The majority of students on programmes at IBCM are aged 18 or over, however, from time to time, a student under the age of 18 at the start of their studies may be admitted. Although most safeguarding-specific legislation applies to under 18s, IBCM applies the same principles to all students in order to provide an inclusive and safe learning environment for all.
- 1.4. IBCM is committed to providing the right level of support to all students and staff and views our duty to prevent those within our academic community being drawn into terrorism as a safeguarding issue. This policy should be read in conjunction with the IBCM Prevent Policy which outlines our approach to handling our responsibilities under the Prevent Duty in more detail.
- 1.5. This policy has been written in accordance with, and with reference to, the statutory guidance and legislation as outlined in section 8 below.

## 2. Policy Statement

- 2.1. IBCM is committed to safeguarding and promoting the welfare of all students, staff, visitors and guests and acknowledges its particular responsibilities to children, young people and adults at risk.
- 2.2. All staff within IBCM have a responsibility to be involved in contributing to a culture in which safeguarding is embedded, discussed openly and risk proactively reduced.
- 2.3. Every member of staff is required to undergo a Disclosure and Barring Services (DBS) check before commencing their employment at IBCM. This is to be updated on a cyclical basis (every three years).
- 2.4. New staff are required to complete training in the following areas and all staff are required to renew this training on an annual basis:
  - Safeguarding;
  - Prevent Duty;

- Mental Health Awareness;
- Health and Safety.

- 2.5. All suspicions and allegations of abuse or concerns about radicalisation will be taken seriously by IBCM. These will be responded to appropriately involving referral to external agencies when necessary. These suspicions and allegations will be acted upon immediately.
- 2.6. IBCM ensures there are appropriate procedures for acting on safeguarding and Prevent concerns and appropriate governance structures in place to ensure that all aspects relating to safeguarding are regularly audited, reviewed and monitored.
- 2.7. It is imperative that all information relating to safeguarding and child protection concerns should be treated as confidential and should not be shared with staff outside of the Safeguarding Team.
- 2.8. Safeguarding concerns must be managed with the highest levels of professionalism and sensitivity. Therefore where information needs to be shared, it will be done so on a need to know basis, in accordance with relevant guidance and legislation by the Safeguarding and Prevent Team.
- 2.9. All IBCM staff and students are required to wear a lanyard at all times when on IBCM premises.
- 2.10. All visitors are required to sign in at reception and will be issued with a visitors lanyard. Visitors must wear the visitors lanyard throughout their visit to IBCM premises, and return this to the front of house team upon signing out. Visitors are to be accompanied by a member of staff at all times.
- 2.11. IBCM's safeguarding policy, and safeguarding and prevent concern procedure are supported by the Safeguarding and Prevent Team. They are responsible for providing comprehensive safeguarding inductions, regular training and reinforcing staff responsibility to recognise, report and respond to concerns.
- 2.12. The membership of the Safeguarding and Prevent team includes the Designated Safeguarding Lead (DSL) who is also the Prevent Lead, the Designated Safeguarding Person (DSP) and a team of Deputy Prevent Leads, and is responsible for responding to safeguarding disclosures under the direction of the DSL. Such actions may include, referring allegations to the relevant investigating agencies such as Local authority , Police, Channel panel, social services; Attending Child In Need meetings and Child Protection conferences where required and appropriate.
- 2.13. The Safeguarding and Prevent Team operate governance and supervision of their activities and deployment of this policy via the Executive Committee. This Committee reports to the Board of Governors.

### **3. Definitions**

- 3.1. Safeguarding: Safeguarding is the action that is taken to promote the welfare of all people and protect them from harm.
- 3.2. DSL: Designated Safeguarding Lead is the member of staff that coordinates all safeguarding concerns and oversees all referrals.
- 3.3. DDSL: Deputy Designated Safeguarding Lead is the member of staff who supports the DSL in maintaining the function of safeguarding throughout all campuses.
- 3.4. LADO: Local Authority Designated Officer
- 3.5. ABUSE: A form of maltreatment of a person. Somebody may abuse or neglect another person by inflicting harm or by failing to act to prevent harm. Someone may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place either wholly online, or technology may be used to facilitate offline abuse. People may be abused by an adult or adults or by young people.
- 3.6. PHYSICAL ABUSE: A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to anyone. Physical harm may also be caused when a responsible adult fabricates the symptoms of, or deliberately induces, illness in someone.
- 3.7. EMOTIONAL ABUSE: The persistent emotional maltreatment of a person such as to cause severe and adverse effects on that person's emotional development. It may involve conveying to a person that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the person opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on people. These may include interactions that are beyond a person's developmental capability as well as overprotection and limitation of exploration and learning or preventing the person from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing people frequently to feel frightened or in danger, or the exploitation or corruption of people. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.
- 3.8. SEXUAL ABUSE: Involves forcing or enticing someone to take part in sexual activities, not necessarily involving violence, whether or not the person is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving someone in looking at, or in the production of, sexual images, watching sexual activities, encouraging people to behave in sexually inappropriate ways,

or grooming someone in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can people under the age of 18. The sexual abuse of children by other children is a specific safeguarding issue (also known as peer on peer abuse) in education and all staff should be aware of it and ACM's policy and procedure for dealing with it.

- 3.9. **NEGLECT:** The persistent failure to meet someone's basic physical and/or psychological needs, likely to result in the serious impairment of the person's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.
- 3.10. **CHILD SEXUAL EXPLOITATION (CSE) and CHILD CRIMINAL EXPLOITATION (CCE)** Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.
- 3.11. **SERIOUS VIOLENCE:** Indicators may signal someone is at risk from or is involved with serious violent crime. These may include increased absence from education, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that someone has been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.
- 3.12. **MENTAL HEALTH:** Mental health problems can, in some cases, be an indicator that a person has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. ACM staff, however, are well placed to observe students day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.
- 3.13. **FEMALE GENITAL MUTILATION (FGM):** FGM is a procedure where the female genitals are deliberately cut, injured or changed, even though there is no medical reason for this to be done. It is also referred to as female circumcision. If a member of staff, in the course of their work, discovers that an act of FGM appears to have been carried out, they must report this to the DSL or DDSL and it must be reported to the police.

- 3.14. PEER ON PEER ABUSE: Children can abuse other children and it can happen inside or outside the institution and online. Even if there are no reports from within the institution, it does not mean it is not happening; it may be the case that it is just not being reported. It is therefore important if staff have any concerns, they should contact the Designated Safeguarding Lead or Deputy. Inappropriate behaviours between peers that are abusive in nature should be challenged. Downplaying certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh” can lead to a culture of unacceptable behaviours, an unsafe environment for people and in worst case scenarios a culture that normalises abuse leading to people accepting it as normal and not coming forward to report it. Peer on peer abuse is seen as a specific safeguarding concern. IBCM therefore additionally covers peer on peer abuse in a separate policy and procedures document.

## **4. Policy Scope**

- 4.1. This policy applies to all staff, students and third parties of IBCM.
- 4.2. This policy is enacted at all times across all IBCM activities including learning and teaching, and any other extra-curricular or external events.

## **5. Procedures**

- 5.1. This policy is enacted via the Safeguarding and Prevent Concern Procedure.

## **6. Related Policies**

- Prevent Policy
- Freedom of Expression Policy
- External Speaker and Events Code of Conduct

## **7. Policy Owner**

- 7.1. This policy is under the responsibility of the Board of Governors.
- 7.2. The Board is responsible for the cyclical review of this policy and delegates operational responsibility to the following staff:
- Principal (DSL and Prevent Lead)
  - Managing Director (DSP)
  - Academic Manager (Deputy Prevent Lead)
  - Quality Manager
  - Accommodation and Wellbeing Officer (Deputy Prevent Lead)
  - HR Officer

## **8. References and Supporting Information**

### *8.1. Internal*

*There are no further internal references.*

## 8.2. External

- Keeping Children Safe in Education (DfE, 2023)
- Working Together to Safeguard Children (HM Government, 2018)
- What to do if you're worried a child is being abused (DfE, 2015)
- The Prevent Duty (DfE, 2015, updated 2023)
- Child sexual exploitation; definition and guide for practitioners (DfE, 2017)
- Sexual violence and harassment between children in schools and colleges (DfE, 2018)
- The Children Act 2004 (with later amendments)
- Safeguarding Vulnerable Groups Act 2006
- The Sexual Offences Act 2003
- Guidance for English Higher Education Institutions (HEIs) (DIUS, 2007);
- Protection of Freedoms Act 2012
- Children and Families Act 2014
- Care Act 2014
- Information sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers (HM Government, July 2018)

## **9.0 Version History**

Version	1.0
Effective from	June 2024
Approved by	IBCM Board of Governors
Date for Review	July 2025