

**ISTITUTO MARANGONI LONDON
SAFEGUARDING POLICY**

Version Control Statement

Version	2.0		
Document title	Istituto Marangoni London Safeguarding Policy		
Document approved by	School Board		
Approval date	07/09/2021		
Date for review	September 2022		
Amendments since approval	Detail of revision	Date of revision	Revision approved by

Istituto Marangoni the London School (IML) is committed to safeguarding and promoting the welfare of students, staff, visitors and guests and recognises its responsibilities to children, young people and vulnerable adults. This policy sets out the School's approach and associated procedures for safeguarding relevant individuals. The policy is reviewed regularly so as to continue to meet relevant expectations and legislation.

This policy applies to all students (including those with safeguarding concerns about peers or staff) and all permanent, contracted, agency and volunteer staff within the School including those who do not have cause to come into direct or regular contact with students in order to carry out their daily duties

This policy focuses on the measures in place for all School members unless specifically stated otherwise.

1. Introduction

1.1. The IML is committed to supporting and promoting the welfare of staff, students and visitors and is committed to the provision of a safe environment conducive to work, study and the enjoyment of a positive experience for all members of its community.

1.2. The IML recognises that within the course of its activities its staff and students may come into contact with children (individuals who are under 18 years old) or vulnerable adults (those over 18 who are rendered vulnerable to harm or exploitation due to their personal situation and/or social circumstances). There may also be situations where a student or staff member falls into these categories.

1.3. The IML wishes to ensure that it maintains the highest possible standards to meet its responsibilities to protect and safeguard the welfare of children and vulnerable adults. The IML is committed to working in partnership with other organisations (as appropriate) to facilitate this.

1.4. In the discharge of its functions, and in implementing this policy and procedure, the IML will remain mindful of its duty of care and other legal obligations, such as those it owes under the Health and Safety at Work Act 1974, the General Data Protection Regulation, safeguarding legislation such as the Safeguarding Vulnerable Groups Act 2006 and the Children Act 2004, the Equality Act 2010, and the Counter Terrorism and Security Act 2015.

1.5. This Policy and associated guidance are designed to assist the IML to achieve the commitments set out above and to take reasonable steps to safeguard those who are vulnerable by ensuring there are clear guidelines and procedures for identifying risk, reporting concerns and that appropriate action is taken.

1.6. Examples of areas where the IML may have contact with children and adults who may be vulnerable may include (this is not an exhaustive list):

- Teaching, supervision and support of students;
- Summer schools, school visits, and other events such as work experience;
- Online events and interactions;
- On placements and in other professional settings;
- Field trips, excursions and other activities such as volunteering and other social activities.

1.7. This policy sets out how the IML will deal with concerns that are raised that an individual may be at risk of exploitation, harm or abuse, including radicalisation, and the type of action that the IML may take to manage such matters and provide support.

1.8. Examples of the type of situations which may result in the IML implementing this policy and procedure may include where (but not limited to):

- A child or adult raises an allegation of abuse, harm or other inappropriate behaviour;

- A student or staff member discloses information involving themselves or family members which gives rise to possible concerns that a potential committer may be harming or abusing vulnerable individuals;
- There are suspicions or indicators that a child or adult is being abused or harmed or is at risk of exploitation, harm or abuse (including radicalisation);
- There are observable changes in a child or adult's appearance or behaviour that may be related to exploitation, harm or abuse (including radicalisation);
- Concerns arise that a student or member of staff has been the subject of sexual violence or harassment;
- Concerns arise that a student or member of staff is vulnerable to radicalisation (the process by which an individual becomes vulnerable to terrorism and the extremist ideologies associated with terrorist groups).

1.9. As the above list indicates, concerns may relate to the behaviour of students and staff, or to how students and staff are affected by the behaviour of others. It is important to note that the indicators of abuse or harm or risk of abuse or harm or radicalisation can be very difficult to recognise and it is not a staff member's responsibility to decide whether a child or adult has been abused or harmed or subjected to abuse or harm, but to raise concerns that they may have, so that concerns can be addressed through the appropriate mechanism.

1.10. The policy recognises that specific areas of activity - for example activities on placement, and the organisation of summer schools - have local procedures designed to promote safeguarding practices and which adhere to this policy. This includes relevant Disclosure and Barring Service and Occupational Health processing.

2. Safeguarding Lead and Deputy Safeguarding Lead – Roles and Responsibilities

2.1. The Safeguarding Lead and the Deputy Safeguarding Lead will ensure that School Members are made aware of and/or briefed (as appropriate) on this Policy. The Safeguarding Lead and the Deputy Safeguarding Lead will engage with appropriate external training. The Safeguarding Lead will ensure that all relevant professional services employees receive the necessary training.

2.2. The Safeguarding Lead and Prevent Working Group will be responsible for (this is not an exhaustive list):

- promoting, implementing, monitoring and reviewing this Policy in accordance with legislation and guidance on the safeguarding of children, vulnerable young adults and adults
- acting as the main contact within the School for the safeguarding of vulnerable young adults and adults
- ensuring (through appropriate delegations) that risk assessments are undertaken prior to any activity involving any young adults or vulnerable adults
- providing School Members with information, advice and training on the safeguarding of young adults and vulnerable adults
- maintaining confidential records of reported young adult or vulnerable adult abuse or welfare cases and the action taken in relation to the IML Member
- making referrals to HR for the DBS where required under the Safeguarding Vulnerable Groups Act 2006 (SVGA 2006) or further to any other regulatory or statutory requirement.

2.3. The Deputy Safeguarding Lead will deputise for the Safeguarding Lead in his/her absence or if he/she is unavailable.

2.4. The internal roles and responsibilities in regard to safeguarding and welfare are summarized as below:

- The Safeguarding Lead/Deputy Safeguarding Lead is responsible for the safeguarding and welfare of students of IML
- The HR Manager is responsible for the safeguarding and welfare of School staff
- The Prevent Working Group is responsible for advising the School Director of referrals in relation to specific prevent issues

- The School Director is accountable for the safeguarding and welfare of School members within the School
- IM Staff (and Student's Guardians where students are under 18) are informed of safeguarding and welfare issues as appropriate
- School members are advised of referrals through induction and through the referral flowchart (Appendix 2).

2.5. All staff are expected to collaborate with each other and with the Safeguarding Lead/Deputy Safeguarding Lead and HR Manager in order to remain vigilant to potential risks to the safeguarding and welfare of staff and students. Any concerns or incidents should be reported to the appropriate person (Appendix 2) as soon as possible.

2.6. High risk situations should be dealt with immediately and the School Director or her nominated deputy, the Director of Education, should be informed if the Safeguarding Lead/Deputy Safeguarding Lead cannot be located quickly. Such risks could include the presence of suspicious persons on or near to IML premises, and evidence of illegal or damaging activity by students or staff.

2.7. All staff are responsible for reporting any concerns they have about staff or students whose actions could cause harm, through local line management or (for the avoidance of doubt) directly to the Safeguarding Lead/Deputy Safeguarding Lead or the School Director.

2.8. All IML staff are expected to set an appropriate example to students and promote positive behaviour in line with the principles noted within the appropriate sections of the provided Staff and Student Handbooks, which would be supplied within the relevant induction activities.

2.9. The names of, and the contact details for, the Safeguarding Lead, the Deputy Safeguarding Lead and Pastoral support are given in Appendix 1.

2.10. Overall accountability for the safeguarding and welfare of staff and students lies with the School Director.

3. Our Approach

3.1. The IML Member may engage with children and vulnerable adults across the range of settings including (amongst others) teaching, research, placement. The IML wishes to ensure that it maintains the highest possible standards to meet its social, moral and legal responsibilities to protect and safeguard the welfare of children and vulnerable adults with whom the IML work brings IML into contact.

3.2. IML Members will be expected to abide by this Policy and all IML staff are responsible for reporting appropriate concerns about safeguarding to the Safeguarding Officer or Deputy Safeguarding Officers.

3.3. The HR Department will undertake appropriate checks with the Disclosure and Barring Service (DBS), in respect of IML Members who will be engaging in the regular activity relating to children/vulnerable adults.

3.4. Where IML Member representing IML engages with children/vulnerable adults within third party organization, that organization's policies and procedures should be followed where any safeguarding issues arise but the IML Member should inform IML's Safeguarding Lead that a safeguarding issue has arisen, and that a report has been made via the third-party organization's procedure.

3.5. All incidents of alleged misconduct concerning children/vulnerable adults and/or abuse of children/vulnerable adults will be taken seriously by IML and responded to swiftly and appropriately in accordance with this Policy; the Policy also establishes key individuals' within IML who are responsible for responding to safeguarding concerns and liaising with the appropriate agencies.

3.6. Where appropriate, breaches of this Policy and/or allegations of misconduct concerning children/vulnerable adults and/or abuse of children/vulnerable adults may result in the IML invoking

relevant staff or student disciplinary procedures or taking other appropriate courses of action in respect of a University Member.

3.7. IML may refer concerns that a Child or vulnerable adult might be at risk of significant harm to the local children's or adult social care services and/or the Police. If the concern related to the IML Prevent Duty with regard to actual or potential terrorism, the matter should be referred immediately to the IML's Prevent Lead.

3.8. IML will do all that it reasonably can to fulfil its safeguarding obligations; it cannot act in the place of a parent or carer and ultimate responsibility will remain with the individual's parent, carer or other agency responsible for their welfare. For contact details for the Safeguarding Officer, Deputy Safeguarding Officers and other individuals referred to in this Policy, please see Appendix 1.

4. First Aiders

4.1. Staff who are appropriately trained in First Aid and designated as such will be listed as First Aiders.

4.2. The main duties of First Aiders are to:

- Give immediate help to casualties with common injuries or illnesses arising at the IML premises
- When necessary, ensure that an ambulance or other professional medical help is called
- Ensure that all First Aid boxes are kept fully stocked.

4.3. IML staff are expected to ensure the welfare of students at all times, particularly in case of emergency. In general terms, the consequences of taking no action are likely to be more serious than those of trying to assist in an emergency.

4.4. The School will ensure there is an appropriate number of trained First Aiders, and these members of staff should be approached first whenever a member of staff, student or visitor is ill or injured. The list of these people should be displayed on staff notice boards throughout IML and at IML Reception.

4.5. The appropriate Risk Assessments should be undertaken to ensure there are sufficient numbers of trained staff to provide adequate cover (allowing for holidays and other absences), and also to allow for the different hazards in different parts of IML premises (lab / sewing room etc.).

4.6. First Aid boxes are provided for use in an emergency and their contents are for the immediate treatment of a casualty so that the condition does not become worse before it is treated by a qualified medical practitioner. First aiders are trained to help in the case of an emergency and the first aid boxes are for their use only.

4.7. Each box is equipped to the Health and Safety (First Aid) Regulations 1981 standard. A list of contents constitutes a part of this Regulation and only these items are permitted to be kept in the boxes.

4.8. In the absence of a First Aider, a member of IML staff should:

- Take charge when someone is injured or becomes ill
- Ensure that an ambulance or other professional medical help is summoned when appropriate.

NOTE: IML staff should not give first aid treatment for which they have not been trained.

5. Identifying and managing potential welfare issues

5.1. IML staff should be aware of the signs of a potential welfare or safeguarding issue. These include (but not limited to):

- Unexplained deterioration in a student's work
- Becoming withdrawn
- Aggressive or disruptive behaviour
- Sudden onset of stuttering

- Becomes distressed – cries easily, refuses to eat
- Visible injuries that are unexplained, unusual or recurring
- Self-harming and attempted suicide
- Lack of respect and tolerance of those with different cultures, life choices, faiths and beliefs.

5.2. Whilst these signs may indicate other problems, these should be considered as possible indications of an impact on a person's welfare and should be investigated immediately.

5.3. Before discussing a potential welfare or safeguarding issue with a student, IML staff should consider the following:

- Am I the best person to help this student with this particular issue(s)?
- Am I able to remain objective?
- Are there any conflicts of interest?
- Will I be compromising my own safety/credibility?

5.4. If a member of IML staff feels unable to directly discuss a particular subject with a member of staff or a student, the issue should be referred to their line manager and the Safeguarding Lead/Deputy Safeguarding Lead or HR Manager (whichever is more appropriate).

5.5. IML staff should be aware of the need to sensitively manage a potential welfare or safeguarding issue. These include:

- Arrange a safe and private environment for the individual to talk
- Listen carefully and stay calm
- Not interrogate the individual, but question normally and without pressure, using open-ended questions
- Reassure the individual that they have done the right thing by discussing any raised issues
- Advise the individual that information may need to be passed to the IML Student Services Manager or HR Manager
- As far as possible consider the wishes of the individual without compromising safety
- Staff should not promise confidentiality – the safety of all School members and staff members' duty of care to students override the maintenance of confidentiality
- As soon as possible make a detailed note of the date, time, place and what the individual said and did and the questions asked
- Contact the Safeguarding Lead/Deputy Safeguarding Lead or HR Manager to discuss the situation as soon as practical (including out of hours if the situation appears to warrant immediate attention). If necessary, escalate to the School Director.

5.6. The Safeguarding Lead/Deputy Safeguarding Lead or HR Manager will outline the action that needs to be taken which may include contact with outside agencies where appropriate.

6. Guidelines for dealing with a suspicion or allegation of abuse involving a non-IML member

6.1. All IML Members must be alert to the possibility that the children or vulnerable adults that may have been or may be, at risk of being abused. Abuse may be at the hands of the individual's family or friends or others outside of the School. All complaints/allegations of such abuse must be taken seriously and dealt with in accordance with the following procedure or any specific advice issued by the Safeguarding Lead/Deputy Safeguarding Lead on a case-by-case basis. Appendices 2 and 3 provide some key guidelines for IML Members working with children or vulnerable adults.

6.2. If an IML Member has a suspicion that a child or vulnerable adult that he/she is working with outside of the School in a third-party organization is being abused by family, friends or others outside of the School he/she should report this via the third party's safeguarding procedures.

6.3. If an IML Member has a suspicion that a child or vulnerable adult within the IML is being abused by family, friends or others outside of the IML, he/she should seek the advice of the Safeguarding Lead/Deputy Safeguarding Lead.

6.4. If an IML Member receives from a child or vulnerable adult an allegation that that child or another child, or that vulnerable adult or another vulnerable adult within the IML, is being abused, has been abused, or is at risk of abuse by family, friends or others outside the IML, he/she should:

- listen carefully and stay calm, acting professionally at all times
- ensure that he/she does not interview the child or vulnerable adult. However, if necessary and only in order to ensure that they understand what the child/vulnerable adult is telling them, he/she may seek to clarify, using open questions and without putting words into the child's or vulnerable adult's mouth
- reassure the child/vulnerable adult that by telling him/her they have done the right thing
- inform the child/vulnerable adult that he/she must pass the information on to the Safeguarding Lead/Deputy Safeguarding Lead
- make a detailed note of the date, time, place, and what the child/vulnerable adult said and did, and the questions asked of the child/vulnerable adult. (See Appendix 2 'Incident Report Form').

7. Guidelines for responding to a suspicion or allegation of abuse involving IML member

7.1. All IML Members must be alert to the possibility that the children or vulnerable adults they are working with may have been, or may be, at risk of being abused by another School Member. All complaints/allegations of such abuse must be taken seriously and dealt with in accordance with the following procedure or any specific advice issued by the Safeguarding Lead/Deputy Safeguarding Lead on a case-by-case basis.

7.2. If an IML Member has a suspicion that a child or vulnerable adult that he/she is working outside of the School in a third-party organisation is being abused or is at risk of significant harm by an IML Member, he/she should report this via the third party's safeguarding procedures. The matter should also be reported (for information) to the IML's Safeguarding Lead/Deputy Safeguarding Lead, setting out the basis of the suspicion as clearly as possible.

7.3. If an IML Member has a suspicion that a child/vulnerable adult within the School is being abused or is at risk of significant harm by another IML Member he/she should seek the advice and assistance of the Safeguarding Lead/Deputy Safeguarding Lead, setting out the basis of the suspicion as clearly as possible.

7.4. If an IML Member receives from a child or vulnerable adult an allegation that that child or another child, or that vulnerable adult or another vulnerable adult, is being abused, has been abused, or is at risk of abuse within the IML by another IML Member, he/she should follow the protocol set out in paragraph 6.4 (above).

7.5. IML Members should not investigate concerns or allegations themselves but should report them immediately to the Safeguarding Lead/Deputy Safeguarding Lead. If either the Safeguarding Lead or Deputy Safeguarding Lead are implicated in the concern or allegation, the matter should be reported directly to the HR Manager. IML Members should not generally make referrals to local children's or adult social care services or other authorities themselves save than in consultation with the Safeguarding Lead. The Safeguarding Lead will always consider with which organization the safeguarding duty lies before taking any action.

7.6. The specific course of action will depend on the situation, on receipt of a credible report of a suspicion/allegation of abuse by an IML Member, the Safeguarding Lead/Deputy Safeguarding Lead may make a referral to the local children's or adult social care services department and/or the Police where there is a risk of harm to a child/vulnerable adult. If the concern relates to the IML's Prevent Duty with regard to actual or potential terrorism, the matter should be referred immediately to the IML's Prevent Lead.

7.7. Where an allegation involves an IML's employee, IML has a duty of care to both the child or vulnerable adult and the IML Member to which any allegation relates. The Safeguarding Lead/Deputy Safeguarding Lead will involve the HR department at the earliest viable opportunity. If appropriate the

staff disciplinary procedure will be invoked. Where an allegation involves a student, IML will consider invoking the Student Code of Conduct and the Procedure for the Suspension and Expulsion of Students from Programmes on grounds of Professional Unsuitability, where appropriate.

7.8. Anonymous concerns should not be ignored and should be dealt with, as far as possible, using the procedure outlined above.

8. Student and staff with a specific medical condition

8.1. Students and staff are encouraged to disclose if they have any specific medical conditions during their application for study, and during their registration with the IML. Those who have specific medical conditions are made known to the Student Services Manager (students) or HR Manager (staff).

8.2. Information relating to staff and students who have a specific medical condition should be documented and managed by the IML Student Services Manager, (students) or HR Manager (staff) and shared only with other staff on a need-to-know basis.

8.3. Students who have specific medical needs should have additional care plans in place (initiated by the IML Student Services Manager) as a measure to ensure that their medical condition is managed appropriately. Additional measures may include regular visits to medical practitioners, increased frequency meetings with tutorial staff or specific adjustments to their teaching environment

9. Individuals with specific religious and cultural needs

9.1. Religious needs - IML School is expected to embrace and celebrate all religions and denominations and make practical and reasonable provision for students to observe their religion during the course of their time at IML.

9.2. Cultural diversity - IML is proud of the wide cultural diversity of its staff and students and takes steps to ensure that cultural differences are respected. The School is expected to recognise the norms and customs associated with particular cultures and to ensure that staff and students can observe and retain them wherever practicable. IML encourages various cultural events to raise awareness and understanding of diversity.

10. Standard Procedure for non-responsive or possible life-threatening injury or illness

- Immediately summon help (first aider, another adult);
- DO NOT move the casualty
- Assess casualty and if applicable and trained, begin CPR or request an Automated External Defibrillator (AED) to be brought to the scene
- For needle stick (sharps) injuries encourage wounds to bleed. Do not suck
- Ring the emergency services number (999) and provide the emergency call taker with any updated information about the emergency
- Confirm the IML address and exact location of incident, noting access difficulties (i.e., room number, building);
- Describe the nature of the emergency (illness or injury) and how many people involved
- Have a member of staff ready to meet emergency medical personnel to expedite their movements
- When medical help arrives pass on any information available, including vomit and any drug samples
- Disperse onlookers and keep the area clear
- An adult should remain with casualty at all times and to assist emergency medical personnel
- If needed assign a staff member to accompany casualty to hospital

- The accompanying staff member must update their line manager or appropriate staff as soon as possible, who in turn should notify the IML Student Services Manager (students)/ HR Manager (staff) and the School Director
- Report the incident following the Incident Reporting and Investigation (as noted below in section 11).

11. Standard Procedure for non-emergency category of students who need to go to hospital

- Seek assistance from a First Aider or the IML Student Services Manager where possible
- Ask the person what has happened and to identify the cause if possible
- If a drug has been used, collect a drug sample if it is safe for you to do so and any vomit for medical analysis
- If a drug has been used, do not induce vomiting
- If a drug has been used, do not chase or over-excite the person if intoxicated from a volatile substance
- If a drug has been used, keep the person under observation, warm and in a quiet space
- A taxi should be booked on the IML's account using normal procedures
- Cover will be organized for the staff (to accompany the patient) duties and time off in lieu of overtime will be given as required;
- When arriving at hospital pass on any information available, including vomit and any drug samples;
- Where and when appropriate, the next of kin/ parent/ agent/ sponsor responsible for any student should be notified.
- The accompanying staff member must update their line manager or appropriate staff as soon as possible, who in turn should notify the IML Student Services Manager (students)/ HR Manager (staff) and the School Director;
- Ensure that the sick or injured individual has means to contact IML staff if sickness escalates. This could be by means of individual's personal mobile (ascertain credit, battery and signal levels);
- Depending on the severity of the illness or injury, a member of staff should make regular checks on the individual;
- After each visit or consultation, the incident report should be updated with time and action taken;
- The IML Student Services Manager (students)/ HR Manager (staff) should receive regular reports of the individual's condition;
- Report the incident following the Incident Report (as noted below);

12. Incident Reports

12.1. All safeguarding related incidents and investigations must be appropriately recorded and documented in the School Incident Log for this purpose and the Safeguarding Lead/Deputy Safeguarding Lead and HR Manager is responsible for maintaining it.

12.2. The School Incident Reports should be stored in a secure place, accessible only to the Safeguarding Lead/Deputy Safeguarding Lead and HR Manager and those members of staff who are required to have access in order to maintain the log. Access to the reports should not be given to members of staff who do not need it, unless this is for succession planning or business recovery purposes.

13. Searches

13.1. A senior member of staff is empowered to search storage, a locker, bag, or other IML property where that member of staff has reasonable cause to believe it contains unlawful items.

13.2. A member of staff is not empowered to search the physical person of an individual, and individuals should be encouraged to produce concealed items voluntarily. Where an individual is suspected of concealing illegal items the police will be called.

13.3. Whenever a search is made, a witness should always be present, and a written receipt given for any item removed. Any searches undertaken should be brought to the attention of the Safeguarding Lead/Deputy Safeguarding Lead or HR Manager and/or the School Director as soon as is practical. Wherever possible, the Safeguarding Lead/Deputy Safeguarding Lead or HR Manager should be present at the time of the search if this is appropriate.

13.4. Any suspected illegal items can be lawfully seized by senior staff and retained in locked storage pending the arrival of police. Staff seizing suspected drugs should avoid any skin contact with the drugs if possible and preserve any relevant packaging.

13.5. Whenever a search of IML premises is requested by the School Director, it is encouraged to assist wherever is practical, unless student welfare is considered to be placed at risk.

14. Anti-bullying

14.1. Bullying is the use of unwanted aggression to hurt another person either emotionally or physically with the intention of causing pain and distress. Such behavior can continue over time to produce increasing levels of anxiety and suffering on the part of the victim. Using offensive, threatening or bullying language to staff or other students, or anyone in School is misconduct. This includes activities on social media or in other online interactions.

Specifically bullying can be:

- Physical: pushing, kicking, hitting, pinching or any other use of physical violence
- Verbal: name-calling, spreading rumours, humiliating, intimidating, threatening
- Emotional: excluding, tormenting (e.g., threatening gestures, being unfriendly)
- Racial: taunts, graffiti, text or other image dissemination, gestures
- Sexual: unwanted physical contact, taunts, graffiti, text or other image dissemination, gestures
- Homophobic: taunts, graffiti, text or other image dissemination, gestures
- Extortionary: demanding money or personal belongings with threats
- Written: including via text, email, social networks (cyberbullying).

14.2. Prevention of bullying - the primary objective should be to prevent bullying taking place in the first place. IML staff should be sensitive to the signs and outward indications of bullying, by:

- Observing individuals' behaviour
- Raising awareness of bullying and the application of this policy and Student/ Staff Code of Conduct in this regard
- Informing others of what is acceptable and unacceptable behaviour
- Encouraging others to report instances of bullying or suspected bullying.

Management of Bullying and suspended bullying

14.3. When IML staff encounter any form of bullying, they should take immediate steps to stop it. They should make a written record of what happened and inform the Safeguarding Lead/Deputy Safeguarding Lead (students) and HR Manager (staff) on each occasion.

14.4. In more serious cases or where the staff member is unable to stop bullying as it occurs, the Safeguarding Lead/Deputy Safeguarding Lead or HR Manager will adopt the following approach:

- Fully investigate the incident
- Inform parents/guardians (if considered appropriate, or if the individual is under 18 years of age or is a vulnerable adult) and invite them to discuss the problem
- Help the perpetrator change their behaviour
- Seek to ensure that the perpetrator apologizes to the victim/ complainant
- Seek a reconciliation between both parties

- If necessary, invoke the Student/ Staff Disciplinary procedure
- If necessary and appropriate, inform the police.

15. Alcohol, drugs and other illegal substances

15.1. IML does not condone the use of:

- Illegal substances
- Alcohol by underage students
- Tobacco by underage students

15.2. IML does not condone the misuse of:

- Glue
- Solvents
- Prescribed medicines
- Over-the-counter medicine
- 'Legal highs'

15.3. The School acknowledges the importance of its pastoral role in the welfare of young people and vulnerable adults. IML staff should seek to encourage others to make informed decisions in order to promote a healthy lifestyle.

15.4 The IML Student and Staff Code of Conduct gives individuals guidance with regard to the use of alcohol and is clear that illegal substances should not be solicited, sold, used or brought onto IML premises at any time. Student and Staff misconduct with regard to alcohol and illegal substances is dealt with through the Student and Staff Disciplinary procedure.

15.5 Drugs Support - there are a number of external websites or organisations that can help individuals who need help with a drug problem. Reference to these sources should be included in drugs related education (where appropriate), details can be obtained from the Student & Academic Services Team.

16. Management of incidents related to alcohol, drugs and other illegal substances

16.1. Assessment of whether an individual may require medical assistance should always be the first priority; guidance for this is noted within the Dealing with Emergencies section.

16.2. When medical assistance is not considered to be an appropriate course of action, the secondary priority should be to ensure the safety of all students and staff from any available alcohol, illegal drugs or related paraphernalia. Guidance for this is noted within the Searches section.

16.3. If considerations of medical assistance and searches have been completed, the next priority is consideration of the ongoing welfare of the student through offering additional advice and information. This is of particular importance in the occasion of a disclosure of drug use in a student or vulnerable adult (or of their legal guardian for students aged under 18). This level of support may take many forms and should be considered under discussions with the Safeguarding Lead/Deputy Safeguarding Lead, guidance is noted within the Drugs Support section herein.

16.4. Finally, if a student is found in possession of a substance suspected of being illegal or there are suitable grounds to believe there is concealment of illegal drugs), IML will inform the local police in all cases, recognizing that additional support should be given to a student who may have a different cultural perception of the police.

16.5. Sanctions - student and staff misconduct with regard to alcohol and illegal substances are dealt with through the Student and Staff Disciplinary procedure.

16.6. Any selling or supplying illegal substances or intending to sell or supply illegal substances on the IML premises will be permanently excluded from the IML. The IML will proactively report such issues to the police as soon as possible and support the police in any resulting prosecution.

16.7. All incidents of suspected selling or supply of illegal substances are taken very seriously and will be investigated by the IML. Whilst any investigation is on-going, the individual will be suspended.

17. Physical restraint of students

17.1. IML should strive at all times to manage individual discipline and antisocial behavior in a positive manner. In the event that an individuals' behavior poses a risk to themselves, other students, staff or property, immediate action should be taken to evacuate all students and staff to a place of safety and local security staff called to the scene, and if necessary, the police.

17.2. Under no circumstances should IML staff (other than local security staff) attempt to physically restrain or intervene. Physical intervention by security staff will be a last resort to maintain order and safety.

18. Visitors

18.1. Visitors are welcomed in the IML where it is appropriate and will not impact the safety and welfare of students or staff. All visitors to the IML should be recorded in a visitor book and should be accompanied by a member of staff at all times.

18.2. There are some eventualities whereby a visitor will arrive unannounced and should be seen and welcomed accordingly, such as a prospective student or a visiting parent.

18.3. Information specific to how staff are checked to be suitable for working in an IML with students (including contractors, external speakers, tutors and volunteers) is overseen by the HR Manager.

18.4. Unexpected and unidentified visitors - if an unidentified person comes onto the premises:

- Challenge the person politely but firmly as to their identity and purpose for entering the premises
- Identify and assess the risks involved
- If doubt arises as to whether the person is entitled to be present, they should be politely questioned and if appropriate escorted off the premises or to Reception to be signed in if present for a genuine reason
- Where appropriate the police or local security team will be called
- Alert the School Director or IML Student Services Manager as soon as is practical
- In situations where an unidentified person is treated as an intruder and escorted from the premises, the incident should be reported following the Incident Report section.

18.5. Aggressive or violent visitors - visitors who display violent, aggressive or other inappropriate behavior towards students or staff (in person, over the telephone or by other means) will not be tolerated and where appropriate the matter will be reported to the police.

18.6. In cases of verbal aggression over the telephone, staff are advised to issue a warning that the telephone conversation will be terminated if a caller becomes aggressive or abusive, prior to ending the call.

18.7. In situations where visitors become aggressive, the incident should be reported following the Incident Report section herein.

18.8. Visitors under the age of 18 - visitors under the age of 18 must be accompanied by parent or guardian at all times. The young person and their guardian must sign the visitor's book upon arrival and departure.

19. E-Safety

19.1. Use of the internet is a necessary tool for teaching and learning. Students and staff use the internet widely both inside and outside the learning environment and all IML School members are

ultimately responsible for their own safety and security when using the internet. IML promotes transparency in its dealings with staff and students; as such internet activity can be monitored by tutors during lessons, by key staff through regular floor walking and by the School's network of Student Representatives.

19.2. The School has an acceptable use policy which prohibits all staff and student access to specific web content classed under the following definitions:

- Pornography;
- Drugs/illegal drugs;
- Criminal/illegal content;
- Potential for radicalization (see 'Prevent');
- Internet Watch Foundation CAIC (child abuse);
- Hate and Racism;
- Malware/Spyware/Phishing.

19.3. IML members proven to have accessed these types of sites will be referred through the School's disciplinary procedures.

19.4. Publishing Content online - prior to publication of any information online, IML staff should always consider the implications for individual personal and IML security. The contact details recorded on websites should on every occasion be the School (or relevant IML) student/ staff address, email and telephone number.

19.5. IML staff will ensure that content published either in printed materials (prospectus, flyers, other marketing information) on its websites, or via social media (Facebook, Twitter, Instagram etc.) is accurate and appropriate. The IML website will always respect intellectual property rights, privacy policies and copyright.

19.6. Social Media - IML staff wishing to use social media applications with students as part of the curriculum must check each site's terms and conditions to ensure that they are appropriate. Students using social media should be encouraged to protect their security and privacy by:

- Setting online passwords
- Making profiles private
- Denying access to unknown individuals
- Blocking unwanted communications
- Using relative security settings and other controls
- Only approving and inviting known friends on social networking sites

19.7. IML staff should not release personal details of any kind which may identify students and their specific time-based location.

19.8. Students should also be encouraged to consider the risks associated with uploading personal information and the difficulty of removing inappropriate images or information once published.

20. Radicalisation (Prevent)

20.1. In the event that the potential Safeguarding issue has a link to actual or potential terrorism, please refer immediately to the School's Prevent Lead.

20.2. The UK faces a range of terrorist threats from groups who seek to radicalize and recruit people to their cause. The School recognizes that IML staff can make a positive contribution towards protecting students and staff from radicalization or violent extremism. To minimize the risk of this eventuality, the School promotes:

- Mutual respect and tolerance of those with different cultures, faiths and beliefs
- Respect and acceptance for other people and their life choices
- Understanding of the importance of identifying and combatting discrimination.

20.3. In the event that concerns are raised about a student or staff member who is exhibiting concerning behaviors this should be reported to the Safeguarding Lead/Deputy Safeguarding Lead or HR Manager immediately.

20.4. Safeguarding Lead/Deputy Safeguarding Lead or HR Manager may take a number of actions to ascertain the appropriate next steps when a concern is reported. These may include seeking further information; referral to an appropriate IML procedure (such as the student disciplinary regulations); referring to an appropriate internal service or support mechanism, such as Human Resources or the Student Wellbeing Service; seeking external advice; or contacting external agencies.

20.5. Safeguarding Lead/Deputy Safeguarding Lead or HR Manager resolves that the police, Social Services or any other agency need to be contacted in relation to a referral then they must pass that to the School Director for final approval. This includes any potential referrals to Channel (Appendix 4).

20.6. Channel is a voluntary multi-agency programme intended to support individuals who are at risk of radicalisation. Either Safeguarding Lead/Deputy Safeguarding Lead or HR Manager may refer a concern to Channel if they consider it to be the most appropriate way to support the individual, and may seek external advice (e.g., from a Prevent Co-ordinator) before doing so. Where a referral is made, the referral will normally be made to the relevant local authority Channel panel, which will determine whether support through the Channel programme is appropriate. If so, the individual referred will be informed at that stage and offered support by the local authority Channel panel.

20.7. Higher Education Schools and Colleges have a history of being open to debate and ideas with students at the forefront of pushing the limits of freedom of expression. ‘Academic freedom’ is a term used to describe the law that allows for open and honest debate in an academic context. However, the safety of welfare of all IML School members is paramount and as such the freedom to express views needs to be balanced. This is maintained by:

- Ensuring the Prevent Lead or Deputy Lead receives WRAP (Workshops Raising Awareness of Prevent) Training
- Ensure that all staff are aware of radicalization through general safeguarding induction training
- Identifying risk for events, activities and initiatives within the IML
- Completing a full Risk Assessment with actions and strategies to reduce extremism
- Fully research potential external speakers’ content to ensure that they do not incite hatred, violence or call for the breaking of the law
- Fully risk assess external speakers to seek to ensure that they/ their content is not linked to organizations advocating extremism.

21. Management of off-site trips

21.1. The definition of an off-site visit is that it is a trip organized by the IML (or by a member of staff) in an official capacity e.g., a tutor during class time), is led by a member of the IML staff, and involves a group of students (or even an individual student). Visits can take place during teaching hours, in the evenings or at weekends.

21.2. Events and excursions outside of IML premises that are not organized by the IML or its staff, or visits which students arrange by themselves are not classed as off-site trips. However, IML staff are expected to encourage safe practice by providing safety information or guidance to students where appropriate.

21.3. For safeguarding and welfare purposes off-site trips as a minimum carry the same duties of care as IML premises (including risk assessment). Namely, the approaches and procedures noted in this document will apply. Examples of visits covered by this policy include:

- Tutors taking their class out of the IML during class time
- Staff taking a group of students off-site during teaching hours (e.g., on a walking tour during induction)
- Staff taking students on social programme events
- Excursions and other events (e.g., boat parties) organized by third parties
- Staff taking students on the occasional field trip, occasionally overseas or overnight

- Staff taking students to venues where alcohol is served.

21.4. Multiple methods of transport (including public transport) can be used for an off-site trip; however, students are not to be taken on visits in transport owned by IML staff.

21.5. Preparation of off-site trips - Prior to an off-site trip, the organizing member of staff must make the following preparations as a minimum:

- Complete an Offsite Working Form (including Risk Assessment)
- Provide a detailed itinerary (including contact details) to the IML Student Services Manager
- Consider if any special arrangements need to be made, for example an accessible route if there is disabled member of the group, and plan accordingly
- Supply the list of participating students to the IML Student Services Manager, including names and mobile numbers (any student who does not have a mobile phone must be paired with someone who does).

21.6. Facilitate a briefing with the travelling students that should include:

- Instructions on what to do if a student gets lost or finds themselves in difficulty
- Provide emergency contact details (ask students to input this into their phones)
- Ensure that the leader of the trip has student contact details
- Cover any other information relevant to the visit (e.g., appropriate behaviour at an event; road safety; public transport information; weather conditions, destination information; time of arrival and return);
- An opportunity for students to ask any questions.

ISTITUTO MARANGONI LONDON APPENDIX 1: KEY CONTACTS

IML Safeguarding Lead
Anna Licholat – Student & Academic Services Manager
E: a.licholat@istitutomarangoni.com
T: 0207 377 9347

IML Deputy Safeguarding Lead
Katie McIntyre – Programme Leader for Foundation Studies
E: k.mcintyre@istitutomarangoni.com
T: 0207 377 9347

School Director
Charlotte Gorse
E: c.gorse@istitutomarangoni.com
T: 0207 377 9347

Director of Education
Abdullah Abo Milhim
E: a.abomilhim@istitutomarangoni.com
T: 0207 377 9347

Police non-emergency number: 101

Adult Social Care Services Tower Hamlets
E: adultcare@towerhamlets.gov.uk
T: 020 7364 5000 / 020 7364 5005
Opening Hours: 9am-5pm, Monday to Friday

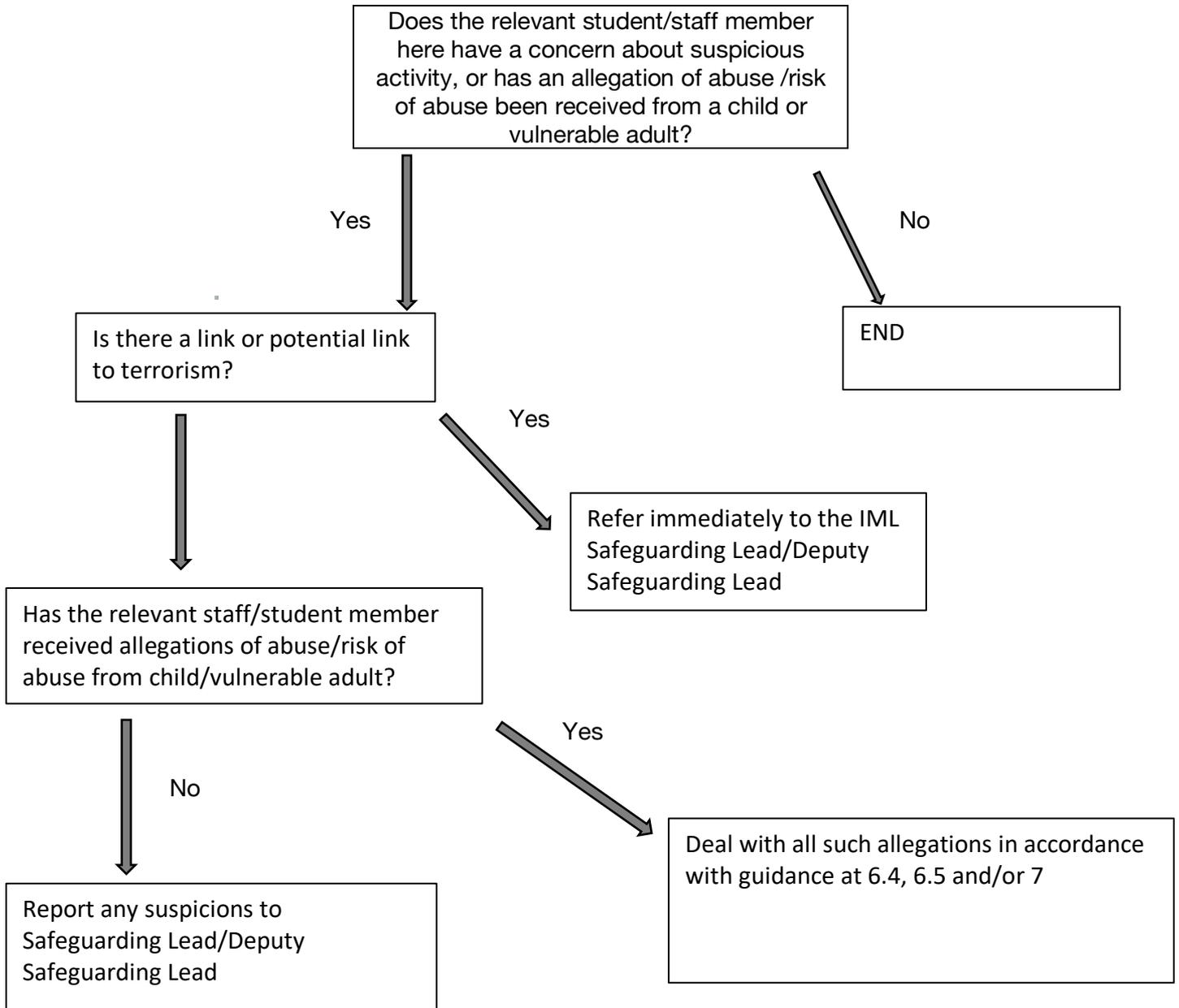
Children Social Care Services Tower Hamlets
T: 020 7364 5601 or 020 7364 5606

NSPCC
T: 0808 800 5000
E: help@nspcc.org.uk

NSPCC – 18's or under
T: 0800 1111

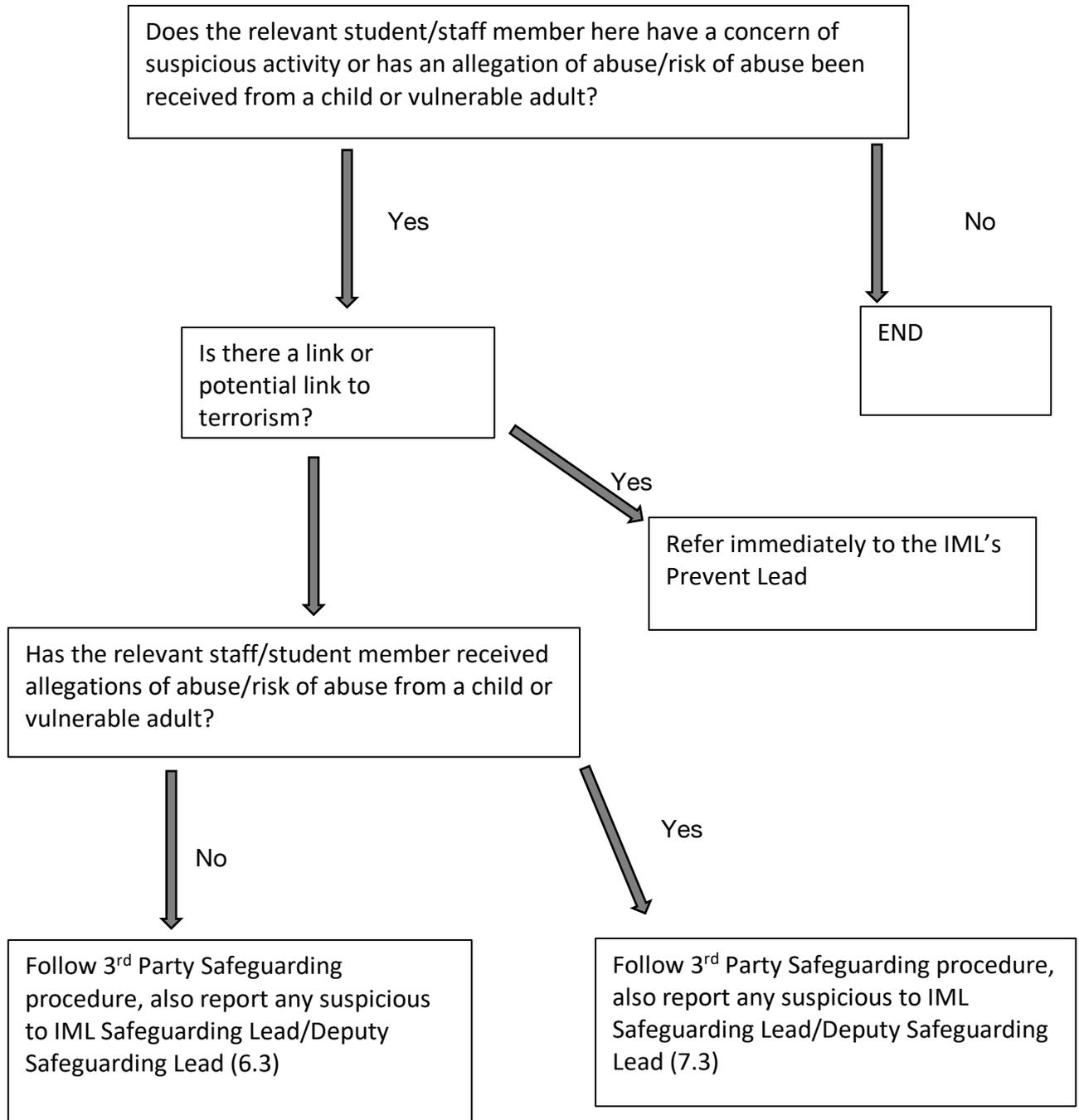
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APPENDIX 2: REPORTING CONCERNS CHART

Reporting Concerns – Planned activity being carried out by IML



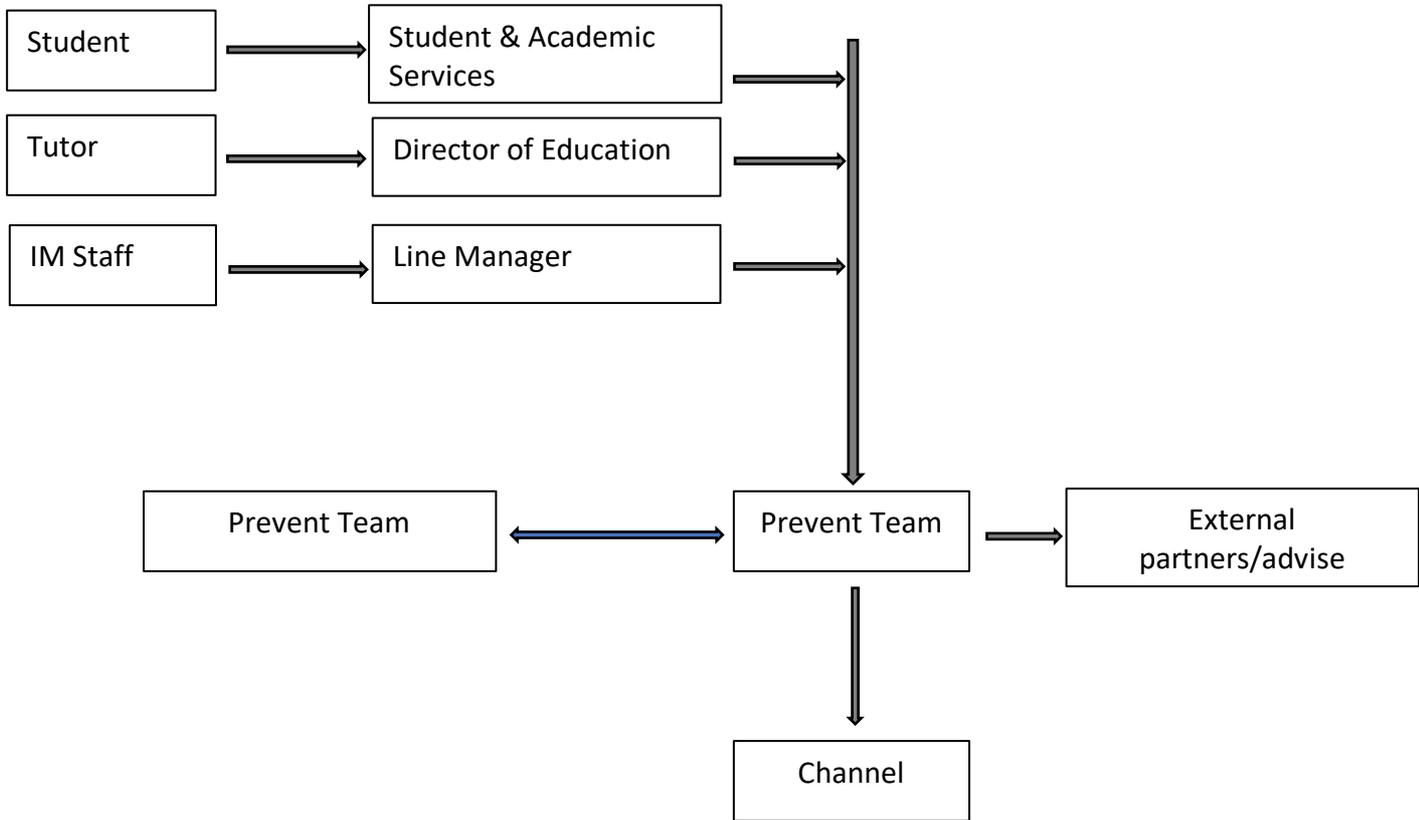
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APPENDIX 3: REPORTING CONCERNS FLOWCHART

Reporting Concern – Regulated Activity being carried out external to the School



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Prevent Duty - Reporting



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APPENDIX 5: INCIDENT REPORT FORM

Details of Incident

Date and Time of incident	
Where the incident occurred	
Brief description of the circumstances of the incident (including names of any parties involved)	

Details of injured party

Full name of injured party	
Parent/Guardian name and contact number	
Address	
Home telephone number	
Mobile telephone number	
Sex	Male <input type="checkbox"/> Female <input type="checkbox"/>
Date of birth	
Nature of injury/abuse	

Comment/explanation given by injured/abused party	
Names and contact details of witnesses (if any)	
Initial actions taken	

Details of person completing report

Name and contact details	
Signature	
Date	

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APPENDIX 6: GUIDELINES FOR IML MEMBER WORKING WITH CHILDREN

IML Members are reminded that it is a criminal offence for an adult to engage in sexual activity with a young person where the adult is in a position of trust in relation to the under 18-year-old.

The IML recommends that all IML Members take steps to ensure that they do not put themselves in a position where an allegation of abuse can be made against them. Such steps include, but are not limited to:

- Always working in an open environment with children
- Avoiding unnecessary physical contact with children
- Avoiding inappropriate familiarity with children
- Always acting upon and recording allegations/reports of abuse made by children
- Always reporting potential concerns/allegations/reports of abuse made by children to the Safeguarding Lead, or in his/her absence the Deputy Safeguarding Lead
- Not inviting or allowing children to socialise with them and/or to visit them at home
- Reporting any potential concerns to their head of department.

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APPENDIX 7: GUIDELINES FOR IML MEMBERS WORKING WITH VULNERABLE ADULTS

IML Members are reminded that it may be a criminal offence for an adult to engage in sexual activity with a vulnerable adult (as defined within this policy) where the IML Member is in a position of trust.

The IML recommends that all IML Members take steps to ensure that they do not put themselves in a position where an allegation of abuse can be made against them. Such steps include, but are not limited to:

- Always working in an open environment with the vulnerable adult
- Avoiding unnecessary physical contact with the vulnerable adult
- Avoiding inappropriate familiarity with the vulnerable adult
- Always take concerns regarding allegations made against partners (including allegations of domestic abuse), hate crime, allegations against carers and/or institutions seriously
- Always acting upon and recording allegations/reports of abuse or harm made by the vulnerable adult
- Always reporting potential concerns/allegations/reports of abuse made by vulnerable adults to the Safeguarding Lead/Deputy Safeguarding Lead, upon receipt of this information the Safeguarding Lead/Deputy Safeguarding Lead will adhere to the key principles underpinning all adult safeguarding work:
 - Not inviting or allowing the vulnerable adult to socialise with them and/or to visit them at home
 - Maintaining clear professional boundaries in the use of social media
 - Reporting any potential concerns to their head of department.

ISTITUTO MARANGONI LONDON APPENDIX 8: GLOSSARY OF TERMS

Safeguarding – measures to protect the health and wellbeing of children young adults and vulnerable adults

Safeguarding Lead – a person appointed to take a lead responsibility for health and wellbeing of children young adults and vulnerable adults

Deputy Safeguarding Lead – a person appointed to take a lead responsibility for health and wellbeing of children young adults and vulnerable adults in absence of Safeguarding Lead

Students Welfare – services available in school to promote and support student personal, social, and learning needs and enhance the wellbeing

Abuse – any action that intentionally harms or injures another person, this refers to physical, psychological, emotional, sexual, verbal abuse

Bullying – ongoing and deliberate misuse of power through repeated verbal physical and/or social behaviour that intends to cause physical, social and/ or psychological harm

Prevent Duty - The [Counter-Terrorism and Security Act 2015](#) contains a duty on specified authorities to have due regard to the need to prevent people from being drawn into terrorism. This is also know as the Prevent duty.

In March 2015, Parliament approved guidance issued under section 29 of the act about how specified authorities (Higher and Further Education providers) are to comply with the Prevent duty. Specified authorities must have regard to this guidance when complying with the Prevent duty

Radicalisation – the process by which people come to support terrorism and extremism