LSE Safeguarding Policy

1. Introduction

1.1. The School is committed to ensuring the safety of everyone involved in School activities. This includes the duty of care to safeguard children, young people and adults at risk during interactions relating to School activities, irrespective of duration or location.

1.2. This policy applies to all staff, students and volunteers (irrespective of whether they act in a paid or unpaid capacity), who may be working with children, young people or vulnerable adults through the School's teaching, research activities and other initiatives or outreach programmes. Children, young people and vulnerable adults will be referred to within this policy as 'vulnerable groups'.

1.3. Whilst this policy sets out the School's general responsibilities in ensuring the protection of vulnerable groups, it will also be necessary for appropriate local provisions to be made in a number of areas of the School, depending on the nature of their activities. As such, those expecting to work with vulnerable groups (regularly or occasionally) should always refer to any more detailed local guidance, and/or the relevant safeguarding officer or service leader, alongside this policy.

1.4. It is assumed generally that all individuals will conduct themselves in a professional manner with integrity, upholding the reputation of the School at all times, in line with the School's Ethics Code.

2. Policy aims

2.1. This policy aims to provide clarity on the School's legal obligations relating to vulnerable groups and identifies the key responsibilities relating to safeguarding for all individuals associated with the School.

2.2. This policy does not seek to discourage activity that contributes positively to the School's interest and/or has community value; instead, it seeks to ensure an environment free from harm and offer ongoing assurance to staff, students, volunteers and visitors that their experience at the School will be a positive one. Ultimately, it aims to facilitate the management of the risk associated with the duty to protect vulnerable groups.

2.3. Vulnerable groups are as follows: A 'child' is defined as a person under 18 years of age[1]: where the context specifically relates to older children, the term 'young person' is used. A 'vulnerable adult' is broadly defined as someone aged 18 or over who may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of themselves, or unable to protect themselves against significant harm or exploitation either temporarily or permanently[2].

2.4. At times it may not always be explicitly obvious that a person or group (regardless of age) may be considered vulnerable. Although the list below is not exhaustive, a person is likely to be considered vulnerable if they:

- have a learning or physical disability; or
- have a physical or mental illness, chronic or otherwise, including an addiction to alcohol or drugs; or
- have a reduction in physical or mental capacity.

The following examples are indicators that may suggest a person is to be considered vulnerable, because either temporarily or permanently they are:

- being detained in custody; or
- receiving community services because of age, health or disability; or
- living in sheltered or residential care home; or
- being unable for any other reason to protect themselves against significant harm or exploitation.

3. Policy responsibilities

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[1] Children Act 1989

[2] Safeguarding Vulnerable Groups Act 2006

3.1. SMC have designated lead responsibility for safeguarding at the School to the Chief Operating Officer, who is tasked with ensuring that the importance of safeguarding vulnerable groups within the School is understood. The Academic Registrar (for students) and the Director of Human Resources (for staff) deputise for the Chief Operating Officer in their absence.

3.2. However, the responsibility for formal procedural arrangements continues to reside locally with assurance that advice can be sought at any time from the designated lead or their nominated contact.

3.3. All areas of the School with regular or occasional contact with vulnerable groups are obligated to ensure that appropriate arrangements are in place to operationalise this policy, and that these are regularly reviewed and updated to ensure the content of this policy is continually reflected upon, delivered and maintained. These areas of the School must ensure that all staff in their area are made aware of this policy, and that they receive appropriate training.

3.4. Specific responsibilities apply to certain key members of staff.

3.4.1. Heads of Department, Service Leaders, Centre and Institute Directors are responsible for:
- Ensuring that appropriate local safeguarding provisions are made for their areas of work, including (where necessary) more detailed local guidance to supplement this policy.

3.4.2. Recruiting/line managers are responsible for:
- Ensuring that they follow the relevant recruitment and selection policy and procedure, including clarifying where a role requires a DBS check and liaising with HR to ensure that appropriate checks are in place.
- Informing Human Resources where job roles change to include contact with vulnerable groups and to discuss new requirements for appropriate record checks.

3.4.3. Human Resources (HR) are responsible for:
- Liaising with managers to ensure that DBS checks are carried out as required for certain roles, and for ensuring that a central record is kept of all such completed checks.

4. Working with vulnerable groups

4.1. Examples of areas around the School with roles that this policy may relate to include (this is not an exhaustive list):

- Residences, including Wardens and Subwardens in halls of residence
  • Widening participation
- Those working with disabled students and staff
- Those working with students and staff with mental health issues
- Counselling
- Those responsible for organising and supporting visits to the campus, for open days, and taster days
- Student ambassadors
- Mentors
- Academic Advisers
- Any staff who work with vulnerable groups, either via academic research, or through public engagement
- Professional Services Staff (in particular departments)

4.2. Some of the roles within the areas of the School listed above may or may not require Disclosure and Barring Service (DBS) checks; if in doubt individuals should check with their Human Resources Partner for clarification.

4.3. LSE is committed to safeguarding and promoting the welfare of vulnerable groups, in response to specific legislation, and as part of our common law duty of care. This includes taking all reasonable measures to:

- Ensure that the School's environment is safe, secure and inclusive of those from vulnerable groups.
- Ensure that staff, students and governors are familiar with the School's Ethics Code which sets out guidelines for the whole LSE community regarding expected behaviour.
- Ensure that recruitment processes (outlined below) are followed, in order to ensure that all job roles with known, direct contact with vulnerable groups have had the appropriate background checks conducted.
- Ensure that anyone suffering from or who has suffered significant harm is identified and responded to appropriately and quickly.
- Ensure that all concerns are taken seriously, and responded to appropriately and quickly. All groups should be respected and have their views heard and considered irrespective of age or other presentation.
- Work co-operatively with School divisions and other agencies that provide safeguarding services for vulnerable groups, and in partnership with parents and guardians where appropriate.

4.4. In order to safeguard oneself from raising the concerns of others about your behaviour towards vulnerable groups, it is good practice to be vigilant that interactions are open and transparent at all times. To this end, staff should:

- In accordance with the Ethics Code, treat all people with dignity and respect, and promote within the School an inclusive and participatory working and social environment in which we encourage, support and behave appropriately to one another.
- Be mindful of interaction which could be considered as favouritism, either directly or indirectly;
- Avoid putting themselves in a position where they might find themselves alone with a vulnerable individual unnecessarily.
- Refrain from using personal contact details such as mobile numbers and email addresses, or engaging in non-work related contact via social networking sites (e.g. Facebook, Instagram, Twitter, Snapchat etc.) Relationships should be kept on a professional, not personal basis. It should not be necessary to contact vulnerable groups outside of School business;
- Exercise care in their use of language, and in their behaviour, and avoid comments or actions which could be interpreted as having a sexual connotation, even in jest;
- Report any concerns, suspicions or allegations regarding the welfare of a child, young person immediately or vulnerable adult to the appropriate officer (see 8 below).

4.5 In addition to those stipulated above, researchers also have a responsibility to consider issues relating to the safeguarding of participants in research projects. This may include staff and students as well as anyone directly affected by research activities either on campus or overseas, e.g. interviewees. As such, all staff and students with a responsibility for carrying out research activities must consider during the planning stages of a research project if there are any safeguarding issues that may arise and identify strategies to minimise or deal with them. In addition, where an issue of safeguarding has arisen during the course of research or is suspected by the researcher, researchers should ensure they have a clear understanding of the steps to be taken and the person or persons to be informed in order to prevent further harm or potential harm from occurring. Please refer to the Safeguarding in Research Contexts document for further information.

5. Recruitment processes

5.1. The School's recruitment processes ensure that all job roles with known, direct contact with vulnerable groups have had the appropriate background checks conducted. The School will take all appropriate steps to ensure that unsuitable people are prevented from working with vulnerable groups. Separate procedures exist for the purposes of undertaking DBS checks and should be read in conjunction with the Recruitment and Selection Policy.

5.2. Job roles that require a DBS check will be listed on a single, central record maintained by Human Resources. At the outset of any new recruitment

process, the recruiting manager and HR Adviser can use [an online tool](#) to decide and agree what level of check (if any) is required. Processes relating to this are reviewed periodically to ensure compliance. In addition, the School will carry out further DBS checks for individuals in relevant roles on an ongoing basis; these additional checks will normally take place every three years, as appropriate to the status of the contract of employment and the nature of the work being undertaken.

5.3. Copies of completed DBS checks are not retained on employee files; instead, the employee will be required to bring their original certificate to HR so that the key information can be recorded and any actions taken as appropriate. Further details may be found in LSE's DBS Policy Statement.

6. Safeguarding arrangements with third party providers

6.1. Where LSE has agreements in place with third party providers that may involve working with vulnerable groups or individuals, such as in the provision of childcare services as a benefit offered by LSE, those agreements will include a shared understanding among all parties of the required safeguarding arrangements (such as DBS checks).

6.2. Such understanding applies under this policy to agreements explicitly made between LSE and the third party. Individuals who arrange childcare or another service related to a vulnerable group or individual with a provider outside such agreements are responsible for checking themselves the safeguarding arrangements that are in place.

7. Safeguarding responsibilities under the Prevent duty

7.1. LSE is obligated to engage with the Government's Prevent strategy and provide appropriate training and guidance for members of staff whose role involves safeguarding students.

7.2. Any behaviour which suggests that an individual might be at risk of being drawn into terrorism must be reported in the Prevent duty flowchart (see link in the 'Links' section), so that the matter can be investigated and any appropriate support can be put in place.

7.3. As with other types of safeguarding, the threshold for reporting to our designated officer for consideration through our documented processes is low, because Prevent is concerned with early intervention to safeguard and divert people away from the risk they face.

8. Raising Concerns

8.1. From a moral and social viewpoint, safeguarding is everyone's responsibility at all times. All staff have a responsibility to raise any concerns they may have for the safety and wellbeing of vulnerable groups or individuals who are in contact with the School. These could arise in a variety of ways in a range of situations.

8.2. It is not always easy to recognise a situation that compromises a vulnerable group's safety; however, each person has a responsibility to act if they have any concerns about a child, young person or vulnerable adult, and such concerns are to be taken in good faith. Those concerns may also relate to issues of vulnerability that arise outside the School or the School's activities.

8.3. The person aware of these suspicions or allegations must contact the relevant safeguarding officer, and follow local procedural arrangements (see the 'Links' section below for details). Matters outside the scope of these procedures should be referred to the School's designated lead or their nominated contact immediately for guidance on what action must be taken. All discussions will be treated with discretion at all times.

8.4. The School's designated safeguarding lead has overall responsibility for investigating allegations and other disclosure information, in conjunction with relevant external agencies. However, the responsibility for formal procedural arrangements continues to reside locally, with assurance that advice can be sought at any time from the designated lead or their nominated contact.

8.5. The School's Whistleblowing Policy provides a procedure by which an individual who is contractually connected to the School (including staff, visiting staff, consultants and members of Council and Court) can disclose information in the public interest which is related to suspected serious wrongdoing or dangers related to the running of the School or to the workrelated activities of staff.

Review schedule

Review interval	Next review due by	Next review start
3 year	Oct 2020	July 2020
3 year	Oct 2023	July 2023

Version history

Version	Date	Approved by	Notes
1.0	17 Oct 2017	Council	
2.0	18 Nov 2021	JNICC	

Links

Reference	Link
LSE - Disclosure and Barring Service (DBS) Process Guidance Note:	• https://info.lse.ac.uk/staff/divisions/Human-Resources/Assets/Documents/Recruitment-Toolkit/DBS-Process-Guidance-Note-December-2022.pdf
Whistleblowing Policy:	• https://info.lse.ac.uk/staff/services/Policies-andprocedures/Assets/Documents/lsePubIntDisPro.pdf
Current students	• Cause for Concern: guidance to working with students in difficulty: https://info.lse.ac.uk/staff/services/Policies-andprocedures/Assets/Documents/cauForConCFC.pdf, with a particular focus on mental health concerns, Prevent and forced marriage • LSE staff guide on handling cases of student sexual violence, harassment and abuse: https://info.lse.ac.uk/staff/divisions/equity-diversity-andinclusion/Assets/Documents/PDFs/Internal/LSE-staff-guide-tohandling-cases-of-student-sexual-violence-harassment-andabuse.pdf • LSE Accommodation policy: regarding students who are under 18, disabled students, pregnant students, and trans students: https://info.lse.ac.uk/staff/services/Policies-andprocedures/Assets/Documents/accPol.pdf • Student counselling service: https://info.lse.ac.uk/currentstudents/student-wellbeing/student-counselling • Fitness to Study (FtS) policy: https://info.lse.ac.uk/staff/services/Policies-andprocedures/Assets/Documents/fitStuPol.pdf

Staff members	• Disciplinary and Dismissals Policy and Procedure: https://info.lse.ac.uk/staff/divisions/Human-Resources/Assets/Internal/staff/Policy/PSSDisAndDismissal.pdf • Grievance Policy and Procedure: https://info.lse.ac.uk/staff/services/Policies-andprocedures/Assets/Documents/griPolProAcaSupSta.pdf • Recruitment and Selection Policy (Professional Services Salaried Staff): https://info.lse.ac.uk/staff/services/Policiesand-procedures/Assets/Documents/proStaRecSelPol.pdf • Staff counselling service: https://info.lse.ac.uk/staff/services/staff-counselling
Teaching, research and international activities	Safeguarding in Research and International Activities Policy: https://info.lse.ac.uk/staff/services/Policies-and-procedures/Assets/Documents/safResIntActPol.pdf
Widening participation	• WP team guidance and procedures: https://www.lse.ac.uk/study-at-lse/Undergraduate/wideningparticipation/Assets/PDF/LSE-Core-WP-Team-Safeguarding-Guidance-and-Procedures.pdf • WP team staff code of conduct, activity guidance and reporting procedure: https://info.lse.ac.uk/staff/services/Policies-andprocedures/Assets/Documents/safProWidPar.pdf
Prevent duty	• Policy: https://info.lse.ac.uk/staff/divisions/SecretarysDivision/Prevent • Flowchart: https://info.lse.ac.uk/staff/divisions/Secretarys-Division/Assets/Documents/Prevent/2016-06-28-Prevent-duty-flowchart-for-individual-cases.pdf
Discrimination, harassment and bullying policy	• Policy: https://info.lse.ac.uk/staff/services/Policies-andprocedures/Assets/Documents/harPol.pdf • Online reporting: https://info.lse.ac.uk/making-a-choice/reportan-incident

Contacts

Position	Name	Email	Notes
Chief Operating Officer	Andrew Young	Andrew.Young@lse.ac.uk	Sponsor

Communications and Training

Will this document be publicised through Internal Communications?	**Yes**

Will training needs arise from this policy	**Yes**
If Yes, please give details	