LEITHS EDUCATION

ADULT SAFEGUARDING POLICY

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LEITHS EDUCATION

1. PURPOSE AND COMMITMENT

1.1 Leiths Education is committed to providing a safe, inclusive and respectful environment in which all students, staff, visitors, contractors and others involved with the organisation are treated with dignity and respect.

1.2 Leiths recognises that safeguarding adults is about protecting an adult's right to live and participate in education free from abuse and neglect, while promoting their wellbeing, independence, choice and control.

1.3 Leiths is committed to preventing and responding appropriately to abuse, neglect, exploitation, discrimination and other forms of harm. We will seek to create a culture in which safeguarding is everyone's responsibility and concerns are identified, reported and acted upon appropriately.

1.4 Leiths recognises that all students are adults aged 18 or over. Students are therefore responsible for making their own decisions wherever they have the capacity to do so. Safeguarding arrangements will respect the autonomy, dignity, wishes, feelings and beliefs of the adult while taking proportionate action where there is a risk of abuse or neglect.

1.5 Leiths will adopt a **Making Safeguarding Personal** approach. Safeguarding responses will be person-led and outcome-focused. The adult will, wherever possible, be involved in decisions about what happens and supported to identify what being safe means to them.

1.6 Safeguarding does not mean eliminating all risk from an adult's life. Adults with capacity have the right to make decisions that others may consider unwise or risky. Leiths will seek to support adults to understand and manage risk while taking proportionate action where necessary.

1.7 This policy applies to all Leiths staff, including permanent and temporary employees, directors, volunteers, contractors, agency workers, visiting professionals and external service providers.

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2. LEGAL AND REGULATORY FRAMEWORK

This policy is informed by the following legislation, statutory guidance and local safeguarding arrangements:

- Care Act 2014
- Safeguarding Vulnerable Groups Act 2006
- Equality Act 2010
- Care & Support Statutory Guidance

- Mental Capacity Act
- H&F Safeguarding Adults Board
- London Multi-Agency Adult Safeguarding Policy, Practise Guidance & Procedures
- Modern Slavery Act
- Domestic Abuse Act 2021
- Sexual Offences Act 2003
- Prevent Duty Guidance
- Counter Terrorism & Security Act 2015

and with reference to the following key documents and statutory guidance:

- Keeping Children Safe in Education 2026
- Working Together to Safeguard Children 2026

The Care Act statutory safeguarding framework applies to adults with care and support needs and requires local authorities to make enquiries where the statutory safeguarding criteria are met.

Where another statutory framework applies, including criminal law, equality legislation, data protection legislation or the Mental Capacity Act, Leiths will apply the relevant legal requirements alongside this policy.

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3. DEFINITIONS

3.1 **Adult -** An adult is a person aged 18 or over.

3.2 **Adult with care and support needs**

For safeguarding purposes, an adult with care and support needs is a person aged 18 or over who has needs for care and support, whether or not those needs are being met by the local authority. Having care and support needs does not necessarily mean that an individual is receiving formal care or support services.

3.3 **Adult at risk**

For the purposes of Section 42 of the Care Act 2014, safeguarding duties apply where an adult:

1. has needs for care and support, whether or not the local authority is meeting any of those needs;
2. is experiencing, or is at risk of, abuse or neglect; and

3. as a result of those needs is unable to protect themselves against the abuse or neglect or the risk of it.

These three conditions form the statutory Section 42 safeguarding threshold.

The term "vulnerable adult" will not be used as a blanket description of Leiths students. Staff must not make assumptions about an individual's vulnerability, capacity or ability to make decisions.

3.4 Safeguarding

Safeguarding means protecting an adult's right to live in safety, free from abuse and neglect, while promoting their wellbeing and having regard to their views, wishes, feelings and beliefs.

3.5 Abuse and neglect

Abuse and neglect may be deliberate or unintentional and may occur once or repeatedly. Abuse may be carried out by a stranger, family member, partner, friend, peer, professional, volunteer, carer or another person in a position of trust.

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4. CARE ACT SAFEGUARDING PRINCIPLES

Leiths will apply the six principles of adult safeguarding to all safeguarding activity.

4.1 Empowerment - Adults are supported and encouraged to make their own decisions and give informed consent. Leiths will ask:

"What does the adult want to happen?"

4.2 Prevention - It is better to take action before harm occurs.

Leiths will seek to identify and address risks early and provide students with information about how to recognise abuse and obtain help.

4.3 Proportionality - Leiths will seek the least intrusive response appropriate to the risk presented. The response to a safeguarding concern will be proportionate to the circumstances and will not unnecessarily restrict an adult's independence or choice.

4.4 Protection - Leiths will provide appropriate support and representation to adults who are at greatest risk. Where necessary, Leiths will seek assistance from Adult Social Care, the police, health services or other appropriate agencies.

4.5 **Partnership -** Safeguarding is a shared responsibility. Leiths will work appropriately with the adult, their chosen representatives and relevant external agencies.

4.6 **Accountability -** Leiths will ensure that safeguarding responsibilities are clear, decisions are recorded, actions are followed up and safeguarding arrangements are subject to appropriate oversight.

These six principles are expressly identified in the Care and Support Statutory Guidance as applying across sectors, including further education colleges.

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5. MAKING SAFEGUARDING PERSONAL

5.1 Leiths adopts a **Making Safeguarding Personal (MSP)** approach.

5.2 This means that safeguarding will not be treated simply as a procedural process. Staff should work with the adult to understand:

- what has happened;
- what the adult is concerned about;
- what they want to happen;
- what would make them feel safer;
- what support they need;
- what risks they are willing to accept;
- what outcomes they want from any safeguarding response.

5.3 The adult's wishes and desired outcomes should influence decisions wherever possible.

5.4 Where the adult's wishes cannot be followed, the reasons must be explained and recorded.

5.5 The Care Act guidance states that Making Safeguarding Personal means safeguarding should be person-led and outcome-focused.

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6. MENTAL CAPACITY, CONSENT AND BEST INTERESTS

6.1 Leiths recognises that adults have the right to make their own decisions. The Mental Capacity Act 2005 principles will be followed.

6.2 Adults must be presumed to have capacity unless it is established that they lack capacity to make the specific decision in question.

6.3 Before concluding that an adult lacks capacity, all practicable steps must be taken to support the person to make the decision themselves.

6.4 A person should not be treated as lacking capacity merely because they make a decision that others consider unwise.

6.5 Where an adult lacks capacity to make a particular decision, any decision made on their behalf must be in accordance with the Mental Capacity Act and must be in their best interests.

6.6 Any assessment of capacity must relate to the specific decision at the specific time. Staff should not make general assumptions about a person's capacity.

6.7 Where appropriate, Leiths will work with Adult Social Care and other relevant professionals where concerns involve mental capacity.

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7. CONSENT AND INFORMATION SHARING

7.1 Leiths will normally seek the adult's informed consent before making a safeguarding referral or sharing personal information, where it is safe and appropriate to do so.

7.2 The adult should be provided with sufficient information to understand:

- what information may be shared;
- with whom it may be shared;
- why it may be shared;
- what the potential consequences may be.

7.3 There may be circumstances where information needs to be shared without consent. These may include:

- the adult lacks capacity to make the relevant decision and the Mental Capacity Act applies;
- there is a serious or imminent risk of harm;
- another person is at risk of harm;
- a serious crime may have been committed;
- sharing is required by law;

- sharing is necessary to prevent or detect crime;
- there is a significant public interest justification for sharing the information.

7.4 Any decision to share information without consent must be proportionate and recorded, including the reason for the decision.

7.5 Staff must never promise an adult that information will remain completely confidential if doing so could prevent appropriate safeguarding action.

7.6 Safeguarding information will only be shared with those who need to know in order to safeguard the adult or others.

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8. INDEPENDENT ADVOCACY

8.1 Leiths will work with Adult Social Care to ensure that the adult's right to independent advocacy is considered where required.

8.2 Under the Care Act, an independent advocate may be required where an adult is the subject of a safeguarding enquiry or Safeguarding Adults Review, has substantial difficulty being involved in the process and has no appropriate person to support and represent them.

8.3 Leiths will make relevant information available to Adult Social Care to enable the local authority to consider whether advocacy is required. The Care Act statutory guidance places a specific duty on local authorities to arrange independent advocacy in appropriate safeguarding enquiries and Safeguarding Adults Reviews.

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9. TYPES OF ABUSE AND NEGLECT

Safeguarding concerns may relate to one or more forms of abuse or neglect.

These include:

Physical abuse

- hitting, slapping, kicking, pushing or other physical assault;
- inappropriate restraint;
- inappropriate physical punishment;
- misuse of medication;
- inappropriate force.

Sexual abuse

- rape or sexual assault;
- unwanted touching;
- sexual activity without consent;
- sexual coercion;
- sexual exploitation;
- being forced to view sexual material;
- sexual harassment or unwanted sexualised behaviour.

Psychological or emotional abuse

- threats;
- intimidation;
- humiliation;
- coercive or controlling behaviour;
- verbal abuse;
- isolation;
- harassment;
- cyberbullying.

Financial or material abuse

- theft;
- fraud;
- scams;
- coercion regarding money or possessions;
- misuse of bank accounts;
- pressure relating to financial decisions.

Domestic abuse

Domestic abuse may include physical, sexual, emotional, psychological, financial or coercive and controlling behaviour between partners or family members.

Neglect and acts of omission

- failure to provide necessary care or support;
- failure to respond appropriately to medical needs;
- withholding food, drink or medication;
- failure to respond to known safeguarding risks.

Self-neglect

This may include neglect of personal hygiene, health, nutrition, living conditions or other aspects of personal wellbeing.

Concerns about self-neglect must be considered on an individual basis, taking account of the person's capacity, wishes, circumstances and level of risk.

Discriminatory abuse

Abuse based on protected or other personal characteristics, including:

- disability;
- race;
- religion or belief;
- sex;
- sexual orientation;
- gender reassignment;
- age;
- cultural identity.

Organisational abuse

Poor practice, neglect or abusive practices within an organisation or service.

Modern slavery

Including:

- trafficking;
- forced labour;
- domestic servitude;
- exploitation.

Exploitation and mate crime

Where someone befriends, manipulates or exploits an adult for personal, financial, sexual or other gain.

Honour-based abuse and forced marriage

This may include threats, coercion, violence, intimidation or other abuse intended to control an adult's behaviour in the name of perceived family or community honour.

Female genital mutilation

Any safeguarding concern involving FGM should be responded to sensitively and in accordance with current statutory guidance and relevant criminal and safeguarding law.

Abuse by peers

Adults may be harmed or exploited by fellow students or other adults within an educational environment.

The above list is not exhaustive. Abuse may take many forms and staff should report concerns where something does not feel right even if the behaviour does not fit neatly within one category.

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10. ROLES AND RESPONSIBILITIES

10.1 Board of Directors

The Board is collectively responsible for ensuring that safeguarding arrangements are effective and embedded within Leiths' culture.

The Board will:

- approve the Safeguarding Adults Policy;
- ensure appropriate safeguarding leadership;
- provide appropriate resources;
- receive appropriate safeguarding assurance and reporting;
- ensure significant safeguarding concerns are escalated appropriately;
- ensure lessons from safeguarding incidents and reviews are considered;
- challenge and scrutinise safeguarding arrangements.

The Board will appoint a director with specific safeguarding responsibility.

Board safeguarding lead: Melanie Williams Browne

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11. DESIGNATED SAFEGUARDING LEAD

11.1 The Designated Safeguarding Lead (DSL) **Louise Kissane** has overall responsibility for coordinating safeguarding arrangements at Leiths.

11.2 The Deputy Designated Safeguarding Leads are: **Matt Beavis & Sophie Kidd**

11.3 The DSL will:

- receive and assess safeguarding concerns;
- provide advice and guidance to staff;
- ensure immediate risks are addressed;
- consider whether external referral is required;
- liaise with Adult Social Care and other agencies;
- ensure the adult's wishes and desired outcomes are considered;
- ensure safeguarding records are accurate and secure;
- maintain appropriate safeguarding data;
- monitor safeguarding themes and trends;
- ensure safeguarding training is provided;
- provide safeguarding reports to the Board;
- ensure safeguarding policies and procedures are reviewed;
- ensure staff understand their safeguarding responsibilities;
- support multi-agency safeguarding activity.

11.4 The DSL is not the statutory adult safeguarding authority. Where the Care Act Section 42 criteria may be met, the DSL will liaise with the relevant local authority Adult Social Care service, which has responsibility for determining and undertaking the statutory safeguarding enquiry.

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12. RESPONSIBILITIES OF ALL STAFF

All staff have a responsibility to:

- understand this policy;
- remain alert to safeguarding concerns;
- recognise indicators of abuse and neglect;

- listen appropriately to adults;
- respond sensitively to disclosures;
- report concerns without delay;
- maintain appropriate confidentiality;
- make accurate records;
- cooperate with safeguarding enquiries;
- attend required safeguarding training;
- challenge unsafe or inappropriate practice.

Staff must not attempt to conduct their own safeguarding investigation unless specifically authorised to do so as part of an agreed safeguarding process.

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13. REPORTING A SAFEGUARDING CONCERN

13.1 Any member of staff who receives a disclosure, observes a safeguarding concern or otherwise has reasonable grounds to suspect that an adult may be experiencing or at risk of abuse or neglect must report the concern without delay to the DSL or a DDSL.

13.2 If the DSL and DDSLs are unavailable and the concern is urgent or presents an immediate risk of serious harm, staff must take appropriate immediate action.

This may include contacting:

- emergency services – **999**;
- the police;
- emergency medical services;
- Adult Social Care.

13.3 Staff should not delay action while attempting to contact the DSL where immediate intervention is required.

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14. RESPONDING TO A DISCLOSURE

When an adult discloses abuse or neglect, staff should:

DO

- listen calmly;
- take the disclosure seriously;
- allow the adult to explain in their own words;
- reassure them that they have done the right thing by speaking;
- explain that you may need to share information to keep them or someone else safe;
- ask only necessary clarifying questions;
- establish whether there is an immediate danger;
- report the concern promptly;
- record what was said accurately.

DO NOT

- promise absolute confidentiality;
- investigate the allegation;
- ask leading or unnecessary questions;
- express disbelief;
- make promises about the outcome;
- confront the alleged perpetrator;
- attempt to mediate between the adult and alleged perpetrator;
- delay reporting.

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15. RECORDING SAFEGUARDING CONCERNS

15.1 All safeguarding concerns must be recorded promptly and accurately.

Records should distinguish clearly between:

- fact;
- professional observation;
- allegation;
- opinion;
- information provided by another person.

15.2 Records should include, where relevant:

- date and time;
- location;
- names of people involved;
- what was observed;
- what the adult said;
- relevant direct quotations;
- immediate action taken;
- who was informed;
- whether consent was sought;
- the adult's wishes and desired outcomes;
- any decision to share information without consent;
- any referral made;
- subsequent actions.

15.3 Safeguarding records must be stored securely and separately from general student records where appropriate.

15.4 Records will be managed in accordance with the Data Protection Act 2018, UK GDPR and Leiths' data retention and information governance arrangements.

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16. REFERRAL TO ADULT SOCIAL CARE

16.1 The Care Act Section 42 safeguarding duty applies where an adult:

1. has needs for care and support;
2. is experiencing or is at risk of abuse or neglect; and

3. as a result of those needs is unable to protect themselves against the abuse or neglect or risk of it.

16.2 Where Leiths believes these circumstances may apply, the DSL will consider referral to the relevant Adult Social Care service.

16.3 Leiths may contact Adult Social Care for advice where it is unclear whether a referral is appropriate.

16.4 Leiths will cooperate with any safeguarding enquiry undertaken by Adult Social Care.

16.5 Adult Social Care may ask another organisation, including Leiths, to undertake aspects of an enquiry. Where this occurs, Leiths will comply with the agreed safeguarding arrangements and timescales.

16.6 The objectives of safeguarding enquiries include establishing facts, understanding the adult's wishes, assessing their protection and support needs, protecting them from abuse or neglect, addressing the actions of the person or organisation responsible and supporting resolution and recovery.

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17. POLICE AND EMERGENCY SERVICES

17.1 Where there is an immediate risk to life or serious harm, staff should contact the emergency services by calling **999**.

17.2 Where a criminal offence may have occurred, Leiths will consider whether the police should be contacted.

17.3 The adult's wishes should be considered wherever possible. However, there may be circumstances where police involvement is necessary without the adult's consent, including serious or imminent risk, serious crime or risks to others.

17.4 Where police are involved, Leiths will avoid taking action that could compromise a criminal investigation.

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18. INFORMATION SHARING

18.1 Effective safeguarding requires appropriate information sharing.

18.2 Leiths will share information lawfully, proportionately and only where necessary for the purpose of safeguarding or fulfilling another legitimate legal responsibility.

18.3 Data protection law does not prevent appropriate safeguarding information from being shared where there is a lawful basis for doing so.

18.4 Staff should not assume that someone else will pass on information that may be important to protecting an adult.

18.5 Where there is uncertainty about information sharing, staff should seek advice from the DSL, DDSL, relevant safeguarding agency or appropriate professional adviser.

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19. PARENTS, FAMILY MEMBERS AND OTHER THIRD PARTIES

19.1 As Leiths students are adults, information will not ordinarily be shared with parents, family members or other third parties without the student's consent. As per our T&Cs if a student has nominated a Responsible Adult during enrolment, they may be contacted.

19.2 There may be circumstances where information can or must be shared without consent, including where:

- the adult lacks capacity and the Mental Capacity Act applies;
- there is a serious or imminent safeguarding risk;
- another person is at risk;
- a serious crime has occurred or may occur;
- there is another lawful basis for sharing.

19.3 The adult's wishes and circumstances must be considered before information is shared.

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20. ALLEGATIONS AGAINST STAFF, VOLUNTEERS AND PEOPLE IN POSITIONS OF TRUST

20.1 Leiths will take seriously any allegation or concern that a member of staff, volunteer, contractor or other person working on behalf of Leiths may have:

- harmed or may have harmed an adult;
- committed a criminal offence;
- abused or exploited a student;

- acted in a way that breaches professional boundaries;
- acted in a way that raises concerns about their suitability to work with adults;
- behaved in a way inconsistent with the Staff Code of Conduct.

20.2 Concerns must be reported immediately to the DSL or, where the concern relates to the DSL, to the appropriate senior person or Board safeguarding lead.

20.3 The DSL will consider whether the matter requires:

- immediate protective action;
- referral to Adult Social Care;
- referral to the police;
- internal investigation;
- disciplinary action;
- referral to another statutory or regulatory body.

20.4 Leiths will not conduct an internal investigation where doing so could compromise a police or safeguarding investigation.

20.5 Where a safeguarding concern involves a person in a position of trust, Leiths will cooperate with relevant local authority safeguarding procedures.

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21. LOW-LEVEL STAFF CONCERNS

21.1 Leiths recognises that inappropriate behaviour may not initially meet the threshold for a formal safeguarding referral but may nevertheless indicate a concern about professional boundaries or conduct.

21.2 Concerns about the behaviour of staff or others working on behalf of Leiths should be reported in accordance with the Low-Level Concerns Policy and Staff Code of Conduct.

21.3 Low-level concerns must be recorded and reviewed for patterns or escalation.

21.4 A low-level concern relating to a member of staff is distinct from a student's general pastoral, wellbeing or mental health concern.

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22. SELF-NEGLECT

22.1 Leiths recognises that self-neglect can present complex safeguarding issues.

22.2 Staff should consider:

- the nature and severity of the risk;
- whether the adult has care and support needs;
- whether the adult has capacity to make relevant decisions;
- the adult's wishes;
- whether the adult understands the risks;
- whether there is an immediate danger;
- whether external support is required.

22.3 Where the Section 42 criteria may be met, Adult Social Care should be contacted.

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23. MENTAL HEALTH AND SAFEGUARDING

23.1 Mental health difficulties do not in themselves mean that an adult lacks capacity or meets the Care Act safeguarding threshold.

23.2 Staff should nevertheless remain alert to situations where mental health difficulties may increase an adult's vulnerability to abuse, exploitation, neglect or self-neglect.

23.3 Leiths has a number of staff with appropriate mental health awareness training who can provide initial support and signposting.

23.4 Where a mental health concern also presents a safeguarding concern, the safeguarding procedures in this policy must be followed.

23.5 Staff must not attempt to diagnose mental health conditions.

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24. DOMESTIC ABUSE

Leiths recognises that domestic abuse can affect adults regardless of sex, gender, sexuality, age, disability, culture or background.

Staff should remain alert to:

- coercive or controlling behaviour;
- physical violence;

- sexual abuse;
- financial abuse;
- emotional or psychological abuse;
- stalking;
- threats;
- isolation.

Where domestic abuse is disclosed or suspected, the adult should be supported to identify what they want to happen and appropriate specialist support should be considered.

Immediate danger should be reported to the police by calling 999.

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25. MODERN SLAVERY AND EXPLOITATION

Leiths recognises that adults may be at risk of:

- trafficking;
- forced labour;
- domestic servitude;
- criminal exploitation;
- sexual exploitation;
- financial exploitation.

Concerns should be reported immediately to the DSL.

Where appropriate, Leiths will seek advice from Adult Social Care, the police or other specialist agencies.

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26. PREVENT AND RADICALISATION

Leiths recognises its responsibilities under the Prevent Duty. Staff should be alert to concerns that an adult may be vulnerable to radicalisation or extremist influence.

Prevent concerns should be handled proportionately and sensitively and should not be based solely on an individual's political, religious or other lawful beliefs or expressions.

Where appropriate, Leiths may seek advice from the local Prevent team or make a referral through appropriate channels.

Prevent safeguarding arrangements will be maintained separately from, but alongside, adult safeguarding arrangements.

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27. EQUALITY, DIGNITY AND HUMAN RIGHTS

Leiths will promote equality, dignity and respect in all safeguarding activity.

Safeguarding responses must not discriminate against adults on the basis of:

- age;
- disability;
- sex;
- race;
- religion or belief;
- sexual orientation;
- gender reassignment;
- pregnancy or maternity;
- marriage or civil partnership;
- or any other relevant characteristic protected by law.

Leiths recognises that discrimination itself may constitute abuse or may increase an individual's risk of abuse.

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28. ONLINE SAFETY

Leiths recognises that technology and social media may facilitate:

- financial abuse;
- fraud and scams;
- harassment;
- sexual exploitation;
- grooming;

- coercive control;
- bullying;
- hate crime;
- radicalisation;
- inappropriate or harmful contact.

Students are adults and are responsible for their own use of personal devices. However, Leiths will take reasonable steps to ensure that its own IT systems and online environments are appropriately protected.

Concerns involving online abuse, harassment or exploitation should be reported under this policy and, where appropriate, the Online Safety, Anti-Bullying, Harassment and Sexual Misconduct or other relevant policies.

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29. WHISTLEBLOWING

29.1 Leiths supports staff who raise genuine concerns about safeguarding.

29.2 Where a staff member believes that safeguarding concerns are not being appropriately addressed, they should escalate the concern through the Whistleblowing Policy.

29.3 Where the concern relates to the DSL, it should be reported to:

Maria Dunbar, CEO or the Board Director responsible for safeguarding.

29.4 Where the concern relates to the CEO, it should be reported to:

Melanie Williams Browne – Board Director responsible for Safeguarding

29.5 Staff may also seek advice from the relevant local authority safeguarding service or other appropriate external agency where internal escalation has not appropriately addressed the concern.

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30. SAFEGUARDING ADULTS REVIEWS

30.1 Leiths will cooperate fully with any Safeguarding Adults Review (SAR) where requested by the relevant Safeguarding Adults Board.

30.2 Leiths will consider and implement learning arising from:

- safeguarding enquiries;

- Safeguarding Adults Reviews;
- complaints;
- incidents;
- audits;
- external reviews;
- professional learning.

30.3 Learning will be shared appropriately with staff and incorporated into safeguarding practice.

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31. PROFESSIONAL DISAGREEMENT AND ESCALATION

Where Leiths disagrees with another agency regarding a safeguarding decision, the concern should be escalated through the relevant multi-agency safeguarding arrangements.

Leiths will follow the escalation procedures established by the Hammersmith & Fulham Safeguarding Adults Board.

Where an adult remains at significant risk, disagreement must not result in delay to appropriate safeguarding action.

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32. TRAINING

32.1 All staff must receive safeguarding adults training appropriate to their role.

Training will cover, as appropriate:

- the Care Act 2014;
- safeguarding adults;
- the six safeguarding principles;
- Making Safeguarding Personal;
- recognising abuse and neglect;
- responding to disclosures;
- consent;
- Mental Capacity Act principles;

- information sharing;
- domestic abuse;
- financial abuse;
- modern slavery;
- Prevent;
- online safeguarding;
- professional boundaries;
- reporting procedures.

32.2 New staff will receive safeguarding training as part of induction.

32.3 Safeguarding training will be refreshed at appropriate intervals and supplemented by regular updates throughout the year.

32.4 The DSL and DDSLs will undertake safeguarding training appropriate to their responsibilities and maintain their knowledge through regular updates and relevant multi-agency training.

32.5 Training records will be maintained by HR.

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33. SAFER RECRUITMENT

Leiths will maintain appropriate safer recruitment procedures.

These will include, where relevant:

- identity checks;
- references;
- employment history checks;
- DBS checks appropriate to the role;
- barred list checks where legally applicable;
- overseas checks where appropriate;
- assessment of suitability;
- maintenance of appropriate recruitment records.

Leiths will ensure that contractors and external providers understand their safeguarding responsibilities where they work with or have access to students.

34. GOVERNANCE AND MONITORING

The DSL will provide appropriate safeguarding information to the Board.

This may include:

- number and nature of safeguarding concerns;
- referrals to Adult Social Care;
- significant incidents;
- safeguarding training completion;
- themes and trends;
- actions arising from safeguarding incidents;
- learning from external reviews;
- policy and procedural improvements.

Information presented to the Board will be anonymised where appropriate.

The Board will use safeguarding information to scrutinise, challenge and support the effectiveness of Leiths' safeguarding arrangements.

35. SAFEGUARDING CONTACTS

Designated Safeguarding Lead - Louise Kissane
louise.kissane@leiths.com

Deputy Designated Safeguarding Lead - Matt Beavis
matt.beavis@leiths.com

Deputy Designated Safeguarding Lead - Sophie Kidd
Sophie.kidd@leiths.com

Board Director responsible for Safeguarding - Melanie Williams Browne
Contact via Leiths' school office – info@leiths.com

CEO - Maria Dunbar
maria.dunbar@leiths.com

Hammersmith & Fulham Adult Social Care

safeguardingadults@lbhf.gov.uk or 0800 145 6095

36. Safeguarding Children Occasionally Present on Site

36.1 Leiths Education is an adult-only educational setting and its students are aged 18 or over. However, children and young people may occasionally be present on site, for example as visitors from Partner Schools, guests attending an event, children accompanying staff or visitors, or in connection with external activities. Where a child or young person is present on Leiths premises, Leiths recognises its responsibility to take reasonable steps to safeguard their welfare and protect them from harm, abuse or neglect.

36.2 Any member of staff who has a safeguarding concern about a child or young person, or who receives a disclosure from a child, must report the concern immediately to the Designated Safeguarding Lead (DSL) or, in their absence, a Deputy Designated Safeguarding Lead (DDSL). The concern must be managed in accordance with relevant local safeguarding arrangements.

36.3 The principles and procedures set out in this Adult Safeguarding Policy apply specifically to adult students and must not be used as a substitute for child safeguarding procedures. Where a concern relates to a child, the appropriate child safeguarding referral and escalation processes will be followed.

36.4 Staff must:

- remain alert to signs that a child may be at risk of harm, abuse or neglect;
- listen carefully and respond appropriately if a child raises a concern;
- avoid making promises of confidentiality;
- record concerns factually and promptly; and
- report concerns to the DSL/DDSL without delay.

36.5 Where there is an immediate risk of harm to a child, emergency services or the appropriate local authority safeguarding service will be contacted as necessary.

36.6 The DSL is responsible for ensuring that staff understand the distinction between adult and child safeguarding and that appropriate arrangements are in place whenever children are expected to be present on site.

37. POLICY REVIEW

37.1 This policy will be formally reviewed annually. The DSL will ensure that staff are informed of significant changes to safeguarding procedures and expectations.

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APPENDIX A – SAFEGUARDING RESPONSE FLOWCHART

A safeguarding concern arises

1. Is there an immediate risk of serious harm or danger to life?

YES → Contact emergency services / police on **999** and take reasonable immediate steps to protect the adult.

NO → Continue to step 2.

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2. Listen to the adult

- remain calm;
- listen;
- take the concern seriously;
- establish immediate safety;
- do not investigate;
- do not promise confidentiality.

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3. Consider the adult's wishes

Ask:

- What does the adult want to happen?
- What would make them feel safer?
- Do they consent to information being shared?
- Do they require support to participate?

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4. Report to the DSL/DDSL

Record the concern accurately and promptly.

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5. Consider the Care Act threshold

Does the adult:

- have needs for care and support?

- experience or face a risk of abuse or neglect?
- as a result of those needs appear unable to protect themselves?

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6. Consider referral

DSL considers whether Adult Social Care, police, health services or another agency should be contacted.

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7. Consider capacity and advocacy

- Does the adult have capacity to make the relevant decision?
- Do they need support to participate?
- Should independent advocacy be considered?

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8. Record decisions and actions

Record:

- concern;
- adult's wishes;
- consent;
- capacity considerations;
- decisions;
- referrals;
- actions;
- outcomes.

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9. Follow up

The DSL ensures agreed actions are completed and that learning is identified.

APPENDIX B – KEY QUESTIONS FOR STAFF

When a concern is raised, staff should consider:

About the adult

- What has happened?
- What does the adult say?
- What does the adult want?
- Are they currently safe?
- Do they have care and support needs?
- Do they need additional communication or other support?

About risk

- Is there immediate danger?
- Is anyone else at risk?
- Could a crime have occurred?
- Is the alleged perpetrator still able to access the adult?
- Is there a pattern of behaviour?

About capacity

- Can the adult understand the relevant information?
- Can they retain it long enough to make the decision?
- Can they use or weigh the information?
- Can they communicate their decision?

Staff should not attempt a formal capacity assessment unless appropriately trained and authorised to do so.

About action

- Does Adult Social Care need to be contacted?
- Does the police need to be contacted?
- Is medical attention required?
- Does the adult require advocacy?
- What immediate protective action is required?
- What information needs to be shared and with whom?

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APPENDIX C – IMPORTANT DISTINCTIONS

Safeguarding concern

A concern that an adult may be experiencing or be at risk of abuse or neglect.

Pastoral concern

A concern about a student's wellbeing, engagement or circumstances which may not meet the safeguarding threshold.

Mental health concern

A concern relating to an individual's mental or emotional wellbeing. This may or may not also be a safeguarding concern.

Low-level staff concern

A concern about the behaviour of an adult working for or on behalf of Leiths which may not meet the threshold for a formal safeguarding allegation but may indicate inappropriate behaviour or professional boundary concerns.

Complaint

A concern about the quality, conduct or service provided by Leiths which should be managed through the appropriate complaints process unless it also raises safeguarding concerns.

Safeguarding concern takes priority

Where a pastoral, mental health, complaint or disciplinary issue also presents a safeguarding concern, the safeguarding element must be addressed without delay.
