istitutomarangoni

ISTITUTO MARANGONI LONDON
SAFEGUARDING POLICY AND PROCEDURES

Version Control Statement

Version	4.0
Document title	SAFEGUARDING POLICY AND PROCEDURES
Approved by	Board of Directors
Approval date	August 2024
Date for review	In 2026
Amendments since approval	The Safeguarding Policy and Procedures aim to simplify the previous policy, removing content that falls outside of the institution's statutory safeguarding responsibilities. Some of the content from the original policy has been incorporated into other policies, including a new Student Wellbeing Policy. This updated policy takes account of current national guidelines and aims to make reporting processes clearer for IML staff and other personnel.

1. Introduction

1.1. Istituto Marangoni London (IML) is a specialist higher education provider offering short courses, foundation courses, undergraduate degrees and Master's degrees. IML is committed to providing a safe environment for students, personnel, visitors and guests and this document sets the school's policy and procedures for safeguarding the welfare of children and young people (individuals under the age of 18) and adults at risk. This policy aims to ensure that children and young people, adults at risk, IML students, and all those who work with them, are safe and supported within the school and any activities organised by the school. To achieve this outcome, we take a proactive approach to minimising the risk of harm to all members of our community through effective processes, regular training and clear communication. As a registered higher education provider our safeguarding policy is designed to ensure that we meet the expectations of the Office for Students, in addition to our statutory safeguarding responsibilities.

2. Context

2.1. Safeguarding is everyone's responsibility, however specific responsibilities for the protection of children and young people and adults at risk rest with the Police and Local Authorities. In England children are legally defined as individuals under the age of 18 and young people as those between the ages of 14 and 18. The UN Convention on the Rights of the Child, ratified by the UK government in 1991, states that a child "means every human being below the age of eighteen years." There is no single law that defines an adult at risk. For the purposes of this policy, an adult at risk is a person over the age of 18 years having needs for care and support, and; experiencing, or is at risk of, abuse and neglect and; as a result of those care needs, is unable to protect themselves from either the risk of, or the experience of abuse or neglect.

2.2. Safeguarding legislation applies to all forms of abuse and provides a framework for organisations to share information and cooperate to protect the wellbeing of children and young people, and adults at risk. The practices and procedures within this policy are based on the relevant legislation and related guidance applicable in England:

- The Children Act 1989 and 2004 – places a general duty on local authorities to promote and safeguard the welfare of children in need in their area by providing a range of services appropriate to those children's needs (section 17). It additionally sets out what a local authority must do when it has reasonable cause to suspect that a child in its area is suffering, or is likely to suffer, significant harm (section 47).

- Working Together to Safeguard Children 2023 – statutory guidance on multi-agency partnership working to safeguard and promote the welfare of children.

- The Care Act 2014 – sets out the legal framework for safeguarding adults at risk of abuse or neglect, placing a general duty on local authorities to promote an individual's 'wellbeing'. The Act sets out six principles of safeguarding: empowerment, prevention, proportionality, protection, partnership, accountability.

- The Safeguarding Vulnerable Groups Act 2006 – places a duty on employers, local authorities, regulators and inspection bodies to refer to the Disclosure and Barring Service (DBS) any information about an individual where they have caused harm or pose a risk of harm to vulnerable groups;

- The Counter-Terrorism and Security Act 2015 – places legal duties on higher education providers to have due regard for the need to prevent people from being drawn into terrorism, requiring providers to engage with Prevent, an element of the Government's counter-terrorism strategy aimed at supporting individuals at risk of radicalisation.

- The Public Interest Disclosure Act 1998 – offers some protection for whistle blowers including where they have reason to believe that a criminal act has been or is likely to be committed or that the health and safety of an individual has been or is likely to be endangered

- The Sexual Offences Act 2003 – defines various sexual offences, including those against children, and establishes measures for protecting individuals from sexual exploitation and abuse.

- The Education Act 2002 - requires schools and educational organisations to ensure the safety and welfare of children and young people, mandating policies and practices for child protection.

- The Equality Act 2010 – legally protects people from discrimination on the basis of their protected characteristics.

- General Data Protection Regulation (GDPR) 2018 and Data Protection Act 2018 – ensures the protection of personal data, including sensitive information related to safeguarding issues.

2.3. As IML's premises are located within the London Borough of Tower Hamlets and most students reside in the local area, IML will normally work with the Tower Hamlets Safeguarding Children Partnership and Tower Hamlets Safeguarding Adults Board to address safeguarding concerns. THSCP and THSAB are multi-agency boards that bring together relevant agencies involved in safeguarding children and young people and adults at risk, and include members from the local authority, metropolitan police and the NHS.

2.4. As the Prevent duties mainly relate to vulnerable students, they are included in this policy as a form of safeguarding, however there are specific procedures for reporting related cases that differ from those for reporting other safeguarding concerns. These procedures are outlined in annex C.

2.5. For the purpose of this policy, IML has safeguarding responsibilities in relation to:

- adults at risk registered as students
- adults at risk who are prospective students or engaging in admissions activities
- children and young people registered as students
- children and young people who are prospective students or engaging in admissions activities
- children, young people and adults at risk engaged in other IML activities (such as public events),
- personnel including staff, freelance and visiting tutors in the course of their duties.

3. Policy Statement

3.1. Istituto Marangoni London (IML) is committed to supporting and promoting the welfare of students, personnel and visitors and to providing a safe learning environment in which all members of our community can thrive.

3.2. IML recognises that:

- we (and all connected with us) have a responsibility to safeguard the welfare of:
  - o children and young people studying on IML courses,
  - o adults at risk studying with or working with IML,
  - o those children, young people and adults at risk who come into contact with IML activities,
  - o IML students at risk of radicalisation (see annex C);
- the welfare of the child, young person, adult at risk or student for whom we have duty of care is paramount;
- where we have a duty of care, all individuals, regardless of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex or sexual orientation have the right to equal protection from all types of harm or abuse;
- we must work in partnership with appropriate individuals and agencies to support those for whom we have a duty of care;
- children, young people and adults at risk may suffer harm in external contexts outside of IML's control and where signs of harm are apparent, we will ensure that, where appropriate, concerns are reported to the relevant agency;

3.3. IML expects the same high standard of safeguarding practice from those external organisations that we work in partnership with, including those based overseas.

4. Purpose of the Policy

4.1. The purpose of this policy is to demonstrate IML's commitment to safeguarding children, young people and adults at risk and to ensure that IML:

- provides an environment that is safe for all members of its community;
- operates according to relevant legislation, regulation, guidance and sector good practice;

- personnel, students and other members of our community understand their roles and responsibilities in respect of safeguarding;

- takes appropriate action in the event of incidents/concerns of abuse or risk of harm and provides support to the individual/s that raise or disclose the concern;

- maintains confidential, detailed and accurate records of all safeguarding concerns and securely stores these records (in compliance with GDPR and the Data Protection Act 2018);

- only shares information without consent where there is a serious risk of harm, or where an individual has been harmed;

- takes action to prevent the employment or deployment of unsuitable individuals; and

- operates robust safeguarding arrangements and procedures.

4.2. This policy and procedures will be widely communicated, including within onboarding/induction and mandatory training, and is published on the School's website. Failure to comply with the policy and procedures will be addressed through the relevant disciplinary procedure and may ultimately result in dismissal from the company.

4.3. For the purposes of this document the term 'personnel' includes all permanent, temporary, agency, freelance and volunteer staff as well as company directors.

5. Scope

5.1. This safeguarding policy applies to all personnel, students and visitors who encounter children and young people, and adults with care and support needs as part of IML's activities, including individuals who do not have a specific role in relation to safeguarding.

5.2. The majority of IML's higher education students are over 18 years of age, however a small number of students are admitted to foundation and undergraduate programmes at the age of 17, where they meet the relevant academic entry requirements. Other contexts in which IML may work with young people under the age of 18 or adults at risk include:

- outreach activities including the Saturday Club;

- open days and admissions activities (including online activities);

- work experience and sandwich placements;

- public events such as fashion shows, talks and exhibitions;

- research activities;

- field trips and excursions; and

- short courses.

5.3. This policy forms part of a framework of wellbeing policies which work together to ensure that everyone can learn and work in a safe, respectful and welcoming environment and that welfare concerns are handled in a supportive, proactive and responsible manner. Other policies and procedures in this framework include:

- Student Wellbeing Policy

- Student Code of Conduct and Disciplinary Procedure

- Staff Disciplinary Rules and Disciplinary Procedure

- EDI Policy and Strategy

- Sexual Harassment and Misconduct Policy

- Dignity at Work and Study Policy

- Disability Policy

- Fitness to Study Policy

- [Health and Safety Handbooks](#)

- IT Acceptable Use Policy for Students

- Privacy Notice for Enrolled Students

- [ICT Policy](#)

- Whistleblowing Policy

5.4. Guidance on handling concerns for the welfare of a student that may be linked to a safeguarding concern, such as absence, disengagement, self-harm and suicidal ideation is included in the Student Wellbeing Policy.

6. Commitments

6.1. In order to implement this policy, IML will ensure that:

- Everyone involved in IML activities is aware of the safeguarding procedures appended to this policy, understands their responsibilities and knows what to do if they have a concern relating to the welfare of a child or young person, or adult at risk;

- Any concern that an individual has been harmed or is at risk of abuse is taken seriously, responded to promptly and handled according to this policy and the related procedures;

- The wellbeing of the individual at risk of harm will be prioritised and the child or adult at risk will be supported to communicate their views and where possible, to take account of their preferred outcome;

- Any actions taken will respect the rights and dignity of all those involved and be proportionate to the risk of harm;

- Confidential, detailed and accurate records of all safeguarding concerns are maintained and securely stored in line with our Data Protection Policy and Procedures

- The school cooperates with the Police and relevant Local Authorities in taking action to safeguard a child, adult at risk or individual at risk of radicalisation

- Information about anyone found to be a risk to children, young people or adults is shared with the appropriate bodies (for example, the Disclosure and Barring Service, Police, Social Services)

- Effective supervision, support and training is provided for all personnel;

- Actions taken under this policy are reviewed by the Senior Management Team on a termly basis and by the Board of Directors on an annual basis

- This policy is reviewed annually, or whenever there are changes to relevant legislation or guidance, by IML's Safeguarding and Prevent Steering Group and submitted for approval by the Finance and Resources Committee and the Board of Directors.

7. Safeguarding roles and responsibilities

7.1. Safeguarding is everyone's responsibility. All personnel, students, visitors and other individuals involved in IML activities have a duty to act if they have cause for concern. Some groups or individuals have specific responsibilities as set out in the table below.

Body / Individual	Responsibilities
Board of Directors	The Board of Directors has overall responsibility for ensuring that there are sufficient measures inplace to meet IML's safeguarding objectives. It does this by: • Approving the Safeguarding Policy • Receiving annual reports on safeguarding actions and staff training • Approving the annual Prevent return to the Office for Students • Completing management safeguarding training on safeguarding

	and Prevent awareness training
Audit and Risk Committee	Responsible for: • Receiving risk registers • Receiving the outcomes of periodic internal audits
Finance and Resources Committee	Responsible for: • Reviewing the Safeguarding Policy and making recommendations to the Board of Directors
Safeguarding and Prevent Steering Group	Responsible for: • Overseeing the development, implementation and monitoring of systems, processes and policies relating to safeguarding children and young people, adults at risk and Prevent • Making recommendations to IML's Senior Management Team to ensure compliance with relevant statutory and regulatory responsibilities • Reviewing the annual Prevent return prior to approval by the Board of Directors • Monitoring IML's Prevent action plan and updating it in response to identified risks, regulatory requirements and good practice • Monitoring the delivery of Prevent and Safeguarding training at IML • Reviewing the outcomes of safeguarding case reviews following a reported incident concerning a child or adult at risk • Ensuring that appropriate data are collected about safeguarding activities that enable IML to fulfil its regulatory and statutory duties
Senior Management Team	Responsible for: • Reviewing and recommending safeguarding policy and procedures to the Finance and Resources Committee • Receiving reports of safeguarding cases and overseeing case reviews • Ensuring that safeguarding activities are adequately resourced
School Director	Responsible for: • Oversight of reports to the Office for Students as requested by the Designated Safeguarding Lead • Oversight of investigations into reports made against IML students and personnel in cooperation with the DSL, HR Manager and relevant external agencies
Designated Safeguarding Lead (DSL)	The DSL has responsibility for the implementation of the safeguarding policy and procedures across the School: • Responding to safeguarding incidents, including referrals to local agencies and/or internal procedures as appropriate • Providing advice to colleagues on safeguarding

	concerns/incidents
	• Ensuring that incidents are appropriately reported and recorded and holding secure central records of safeguarding incidents
	• Ensuring that the Safeguarding Policy is kept up to date, available and communicated to all members of the IML community
	• Ensuring that appropriate mechanisms are in place for reporting and recording safeguarding incidents, in accordance with IML's Data Protection Policy
	• Investigating any incidents of non-compliance with the Safeguarding Policy
	• Ensuring that appropriate training programmes are delivered to relevant individuals and records are maintained
	• Ensuring that risk assessments are undertaken where required and acted upon as appropriate
	• Attending relevant enhanced training and maintaining contact with external agencies
	• Chairing the Safeguarding Steering Group
	• Drafting the annual safeguarding report to the Board of Directors and providing regular safeguarding reports to the SMT
Deputy Designated Safeguarding Lead	Responsible for: • Deputising for the DSL in their absence • Responding to safeguarding incidents, including referrals to local agencies and/or internal procedures as appropriate • Providing advice to colleagues on safeguarding concerns/incidents • Ensuring that incidents are appropriately reported and recorded and holding central records of safeguarding incidents, in cooperation with the DSL • Assisting in the communication of the Safeguarding policy and procedures
Prevent Lead	Responsible for: • Responding to concerns about radicalisation, liaising with and making referrals to external agencies as appropriate • Completion and submission of the annual Prevent return to the OfS • Updating and communicating the Prevent action plan • Maintaining contact with the DfE Prevent Regional Coordinator and attending network events

HR Manager	Responsible for:
	• Liaising with the DSL about any allegations of abuse of a child or adult at risk made against IML personnel
	• Investigating any instances of non-compliance with this policy by IML personnel in conjunction with the DSL
	• Coordinating with the DSL to handle any Prevent concerns related to a member of staff
	• Ensuring that safer recruitment practices are implemented
Department Managers and Programme Leaders	Responsible for:
	• Ensuring that team members attend relevant training and maintain awareness of safeguarding procedures
	• Ensuring that safeguarding is considered in the planning of events and activities and risk assessment are conducted as appropriate
	• Informing HR of the need for DBS checks where new staff will be in contact with under-18s
All staff and other personnel	Responsible for:
	• Complying with the Safeguarding Policy, maintaining awareness of the procedures for reporting a safeguarding concern
	• Reporting safeguarding concerns to the DSL immediately
	• Attending regular safeguarding training as required
	• Cooperating with any investigation related to safeguarding concerns
	• Reporting any suspected breaches of the Safeguarding Policy to the line manager or DSL

8. Prevention and Risk Assessment

8.1. In order to minimise the risk of safeguarding concerns arising in the course of its activities, IML requires risk assessments to be undertaken for activities organised off campus or those that extend beyond the normal learning and teaching methods employed by the School.

8.2. An offsite activity risk assessment form must be completed and authorised before any offsite activity takes place and must include consideration of the risks to students, or individuals with whom students may come into contact, including any specific safeguarding risks to children, young people and adults at risk. The risk assessment should outline the steps taken to mitigate or avoid such risks, for example, ensuring that adequate supervision is in place.

8.3. The risk assessment process includes other considerations (such as health and safety risks) and, where numerous risks are identified, should also act as a prompt to consider alternative working practices. Wherever possible, activities should be fully inclusive and not dependent on the exclusion of certain groups (such as under-18s) to mitigate risk.

8.1. Visitors to the School are required to wear a visitor pass whilst on site and must be accompanied by a member of IML personnel. For visits to IML involving groups of children, young people or adults at risk, the group should be accompanied by a suitable number of supervisors from the visiting organisation who have undergone relevant criminal records checks.

9. Record Keeping

9.1. The DSL (supported by the Deputy DSL) is responsible for collating all records relating to safeguarding concerns, including the initial report and details of any subsequent action taken. Central files will be held digitally in a secure location with access restricted to members of the Student and Academic Services team. Further information about recording safeguarding concerns is included in Annex B.

9.2. The DSL will review all open cases on a weekly basis to ensure that records are complete and that action is taken in a timely manner. This will include liaising with the HR Manager in respect of any cases involving IML personnel. The School Director will be informed of any delays or difficulties with the progress of individual cases and will take further action as necessary.

9.3. The Safeguarding and Prevent Steering Group will receive regular reports on the number and type of safeguarding concerns reported and subsequent action taken, and will be responsible for reporting any concerns about the efficacy of record keeping to the SMT.

10. Recruitment and Selection of Staff

10.1. IML recognises that anyone may have the potential to abuse children and young people or adults at risk in some way and will take all reasonable steps to ensure unsuitable people are prevented from working with them.

10.2. As part of its recruitment and selection processes, IML has robust systems in place to ensure pre-employment checks with the Disclosure and Barring Service (DBS) are undertaken where a role is likely to involve regular contact with children and young people or adults at risk, or access to such individuals' personal information or images. Enhanced DBS checks will be carried out for any individuals working with children and young people on a one-to-one basis. For candidates recruited from overseas criminal records checks for 'Certificates of Good Character' may be conducted where appropriate.

10.3. The School will respond to concerns raised about the suitability of applicants during the recruitment process and employees and other personnel (including contractors and volunteers) once appointed, including seeking advice from external agencies where necessary (disclosing information only on a need-to-know basis). Decisions about whether or not to employ an individual whose vetting checks raise concerns will be made on a case be case basis following completion of a risk assessment. For roles subject to enhanced DBS checks advice will also be sought from the LADO or adult social services as relevant. Concerns will normally be discussed with the candidate as part of this process and confidential records will be kept by HR of the reasons for the decision.

10.4. For any role expected to involve working with children or young people, the job description will highlight the safeguarding responsibilities associated with that role. Job adverts will include information about IML's commitment to safeguarding and where applicable, will state that a criminal records check is required. Applicants will be required to complete a self-disclosure form that requires them to declare cautions and convictions as follows.

10.4.1. For roles requiring an enhanced DBS check:
- Do you have any unspent conditional cautions or convictions under the Rehabilitation of Offenders Act 1974? (Y/N)?
- Do you have any adult cautions (simple or conditional) or spent convictions that are not protected as defined by the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (Amendment) (England and Wales) Order 2020? (Y/N)?

10.4.2. For roles requiring a basic DBS check:
- Do you have any unspent convictions or criminal cautions?

10.5. All candidates for roles involving working with children will be subject to an in-person interview. Candidates will be required to show during the interview that they are able to maintain professional integrity and understand their safeguarding responsibilities.

10.6. All offers of employment are subject to two reference checks as part of IML's vetting processes, including one reference from the applicant's current or most recent employer or educational establishment. Where relevant referees will be asked to comment on the candidate's suitability to work with children and young people, or adults at risk, and their knowledge and understanding of safeguarding. All offers of employment will also be subject to identity checks and successful candidates will be required to provide original copies of relevant qualifications.

10.7. Upon appointment, all personnel will receive a copy of this policy and will be required to confirm that they have read this document in full. All new staff and freelance tutors will receive an induction that includes information about IML's safeguarding procedures and the related policies listed in 5.3. All fixed term and permanent contracts of employment are subject to satisfactory completion of a probationary period.

10.8. Where the role of an existing member of staff changes to encompass regular one-to-one contact with children and young people or adults at risk, a DBS check will also be conducted. In these circumstances the HR team will advise on the level of check required and the process to be followed.

11. International Safeguarding

11.1. IML's community is internationally diverse and the School is committed to taking steps to safeguard children, young people and adults at risk from harm or abuse wherever in the world it occurs. We are also conscious of the need to be sensitive, to take account of different legal and cultural contexts, and to balance the need to report with the risk of further harm to the victim.

11.2. Where an incident has taken place overseas but the individual who has experienced or is at risk of harm or abuse is in the UK, the DSL will seek advice from the local authority, which will report onwards to the relevant agencies in the home country where it is safe and appropriate to do so.

11.3. Where a concern relates to a child, young person or adult at risk located overseas who is experiencing, has experienced or is at risk of harm or abuse, the DSL will seek advice from the police in the UK before taking any further action. In some countries, it may not be possible to report an incident due to legal and cultural differences, however any such incidents will be reported to local safeguarding partners in the UK, in accordance with the procedures described in Annex B.

11.4. IML programmes do not normally include international mobility within the curriculum, however students may transfer between IM schools in different countries as part of the cross-school programme. Where this occurs, the safeguarding policy and procedures of the school at which the student is registered will apply. A risk assessment will be carried out in relation to all other international travel involving IML students, within which any potential safeguarding risks will be identified and action taken to mitigate these.

11.5. Personnel who travel overseas to teach or lead activities that involve children, young people or adults at risk may be required to obtain an International Child Protection Certificate. Individuals planning such activities should contact the HR Manager for advice.

11.6. Concerns about international online content will be reported to the local police where a person is believed to be in immediate danger or a crime is in progress. For non-urgent concerns, the DSL will report the content to relevant organisations, including INHOPE, CEOP and the Internet Watch Foundation.

12. Training and Support

12.1. IML requires all personnel to complete safeguarding and Prevent online training modules as part of the onboarding process with refresher training at least every three years. Additional targeted training, including training in FGM and

Modern Slavery, will also be provided for those in positions with specific responsibilities for student wellbeing or pastoral support. All individuals involved in the recruitment of personnel to roles expected to work with children and young people are required to undertake safer recruitment training.

12.2. The Designated Safeguarding Lead and Deputy Designated Safeguarding Lead will be required to complete a recognised leading child and adult safeguarding course, with refresher training every two years.

12.3. The Prevent Lead and other key members of staff will be required to undertake Prevent Referral and Channel training in addition to the Prevent basic awareness course and other relevant training courses provided by the DfE Prevent team.

12.4. IML will provide opportunities for guidance and training on this policy and related procedures to all personnel on an annual basis.

13. Whistleblowing

13.1. All personnel should be aware of their duty to raise concerns, where they exist, about the attitude of actions of colleagues, as outlined in the School's Whistleblowing Policy. Whistleblowing concerns should be raised with the Registrar, School Director, or the Chair of the Audit and Risk Committee.

13.2. IM also provides an online reporting system for those who wish to raise any concern anonymously, including safeguarding concerns.

13.3. If a member of the IML community has concerns about the safety or welfare of a child or adult at risk that they believe are not being acted upon by the School, they have a responsibility to take action. Anyone can refer directly to the Local Authority Designated Officer (LADO), Adult Social Care Services or the Police if they believe that a person is at risk abuse, is being or has been abused.

14. Monitoring and Review

14.1. The Safeguarding and Prevent Steering Group will conduct an annual review of the Safeguarding Policy and procedures, mapping them against any updates to legislation, national and local guidance and the Regulatory Framework for Higher Education. The review process will also take account of any lessons learned from safeguarding case reviews conducted during the preceding year. Any recommended updates will be presented to the Board of Directors for approval.

14.2. The Board will receive an annual report from the Senior Management Team on safeguarding matters, which will include summaries of; the number and type of safeguarding reports received by the DSL, the number and type of safeguarding concerns referred to external agencies, the number and type of safeguarding allegations received about IML personnel and students, the number and type of DBS checks undertaken and details of any recruitment decisions impacted by criminal records checks, information on lessons learnt and changes made in response to any outcomes from safeguarding issues.

Annex A: Safeguarding Code of Practice

1. Introduction

1.1. This Code of Practice sets out IML's procedures for securing the safety and wellbeing of children and young people, and adults at risk of harm on IML's premises or engaged in activities organised by the school.

1.2. Activities involving children, young people or adults at risk could include:
- Open days and student recruitment activities (either in person or online)
- Outreach activities (such as the National Saturday Club)
- Teaching and support of students who are under the age of 18 or considered at risk of abuse
- Public events or exhibitions
- Research activities (subject to ethical approval)

1.3. All departments or individuals planning activities that may involve children, young people or adults at risk must ensure that such activities are appropriately supervised and that this code of practice is followed.

2. Roles and responsibilities

2.1. IML has a duty to act if there is cause for concern. The school will not investigate concerns itself but will record any disclosures of harm or abuse as fully and accurately as possible and will notify the appropriate agencies immediately so that they can investigate and take action as necessary (see the procedures for recording and reporting safeguarding concerns in annex B).

2.2. The contact details of the Designated Safeguarding Lead (DSL) and Deputy DSL are included in annex E. The DSL and Deputy DSL act as a source of advice and guidance for IML's personnel and are responsible for the recording and referral of safeguarding concerns as outlined in the Safeguarding Policy.

2.3. The HR Manager is responsible for handling any allegations of abuse made against IML personnel, in cooperation with the School Director.

2.4. The DSL, in conjunction with the HR Manager, will provide relevant training for all personnel responsible for activities involving children and young people, including those undertaking research involving children and young people. All research activities involving participants under the age of 18 will be subject to ethical approval (please refer to the Research Ethics Policy for further information).

3. Professional Conduct

3.1. When interacting with children and young people or adults at risk in the course of their activities at IML, all personnel should adopt high standards of personal conduct and take steps to ensure that they avoid situations where an allegation of abuse could be made against them.

3.2. Key principles for maintaining a professional approach include:
- Treating all individuals with dignity and respect, in a manner that takes account of their age and any additional needs they may have
- Interacting with children and young people in the company of others wherever possible
- Maintaining visual access or open doors in one-to-one situations
- Avoiding physical contact
- Not divulging personal contact details (such as telephone numbers or home address)
- Not discussing matters of a personal nature
- Not discussing topics of a sexual nature (except where part of a job role or where taught as part of the validated curriculum)
- Avoiding any comments that could be considered indecent or sexually suggestive
- Avoiding social contact outside of IML premises or organised activities
- Avoiding contact through personal social media accounts

- Not taking photographs, video or audio of students using personal devices or equipment
- Not visiting a student's personal address
- Not inviting students to one's living accommodation
- Not asking students to assist with personal tasks or errands
- Abiding by IML's policies related to student welfare, including the Safeguarding Policy
- Discussing any potential concerns with a manger or the Designated Safeguarding Lead

3.3. These guidelines represent good practice when interacting with all students, not just young people and adults at risk.

Annex B: Responding to and Reporting Safeguarding Concerns

1. Introduction

1.1. These guidelines set out the process that must be followed whenever a child, young person or adult at risk discloses an allegation of abuse, where a third party (such as another student or a visitor) alleges or suspects abuse and reports this to you or where you yourself suspect or have witnessed the abuse of a child, young person or adult at risk.

1.2. All allegations and suspicions of abuse must be taken seriously. These procedures must be followed whenever an allegation is made that a child, young person or adult at risk has been abused or where there is a suspicion that they have been abused or are at risk of abuse.

1.3. Do not assume that it is someone else's responsibility to report a safeguarding concern. All IML personnel must:
- be familiar with and follow this safeguarding policy and procedures
- be alert to potential signs and indicators;
- take appropriate action when necessary;
- seek guidance from a manager or the Designated Safeguarding Lead where required;
- undertake regular safeguarding training.

2. Responding to disclosures of abuse

2.1. It can be very difficult for an individual to open up about what has happened to them and they may be worried that they will not be believed or be taken seriously. It is important that you listen carefully and respond sensitively. Creating a safe space to talk is crucial in breaking down barriers to disclosure. The table below includes some things to bear in mind should you receive a disclosure.

DO	DON'T
• Stay calm • Recognise your feelings, but keep them to yourself • Use language that the person can understand • Reassure the person that: telling you is doing the right thing; they are not to blame; you believe that they are telling the truth • Listen carefully, record what the person says straight after the conversation and keep these notes • Explain what you will do next (i.e. tell a Designated Safeguarding Lead) in a simple and clear way • Follow the safeguarding procedure and seek advice where needed	• Panic or delay • Express strong feelings of upset or anger • Use jargon or express opinions • Probe deeply for information • Use leading questions • Make them repeat the story • Promise unconditional confidentiality • Approach the person against whom the allegation has been made, or discuss the disclosure with anyone other than a manager or Designated Safeguarding Lead

3. How to raise a concern or report an allegation

3.1. As soon as you suspect or become aware of an allegation of abuse you must make a full record of the nature of the incident/allegation and any other relevant information. The Safeguarding Concern Reporting Form should be used for this purpose and must be completed on the same day you become aware of the concern.

3.2. The form should record the date, time, people present, what was said (verbatim if possible) and any action taken. Where an allegation is disclosed directly by the alleged victim, you should also include any observations about their appearance and behaviour in a factual way. Leading questions and personal opinions should be avoided as they may impede subsequent investigations or court proceedings.

3.3. The completed form should be immediately emailed or handed to a Designated Safeguarding Lead (DSL) using the contact details on the form. No student or personnel other than the DSL and Deputy DSL is not expected to liaise with external agencies. If both the DSL and Deputy DSL are unavailable, the School Director should be informed and will make contact with the police, local authority or other relevant organisation as required.

3.4. The Designated Safeguarding Leads will maintain records of all safeguarding concerns relating to a child or adult at risk and these records will be held in a secure file, separate from the main student record. In order to preserve confidentiality, these records will only be accessible to members of the Student and Academic Services team and the information contained therein will only be shared with other members of staff or external agencies when strictly necessary in order to support or maintain the safety of the individual concerned.

3.5. All safeguarding records of concern for children, young people and adults at risk are kept for 10 years or, in the cases of children or young people, until the individual is 25 years old whichever is the longer.

3.6. All records of safeguarding allegations against personnel, will be retained for a minimum of 10 years from the date of the allegation or until the individual's normal retirement date, whichever is the longer. Cases in which an allegation was found to be false, unfounded, unsubstantiated or malicious will not be referred to in employment references. Details of allegations following an investigation that are found to have been malicious or false will be removed from personnel records unless the individual gives their consent for retention of the information. However, for all other allegations, i.e. substantiated, unfounded and unsubstantiated records are kept to enable accurate information to be given in response to any requests to provide clarification such as where future DBS checks reveal information from the police about an allegation that did not result in a criminal conviction and it will help to prevent unnecessary re-investigation if, as sometimes happens, an allegation re-surfaces after a period of time.

4. Information sharing and external reporting

4.1. The Designated Safeguarding Lead will assess the level of risk and where appropriate, seek advice from external agencies regarding the appropriate course of action, sharing information as appropriate to best protect the child or adult at risk. Where risk of harm or abuse is identified, the DSL will involve the individual in the reporting process and gain their consent where possible. The DSL will take action without consent where this is considered to be in the best interests of the child, young person or adult at risk.

4.2. Concerns about adults at risk will normally be reported to Tower Hamlets Adult Social Care team, and concerns about children and young people to Tower Hamlets Multi-Agency Support Team (MAST) however, where the individual is in immediate danger, the matter will be reported to the Police in the first instance. The initial report will normally be made by telephone; however, the DSL will provide a written report within 24 hours. Written records will be retained by the DSL, indicating when and to whom the matter has been reported. The DSL will discuss with the local authority what action will be taken to inform parents or emergency contacts about the concerns raised.

4.3. IML will seek consent from the reporting child, young person or adult at risk before sharing safeguarding information confidentially to an external authority or agency. However, information may be shared without consent if the School believes that there is good reason to do so, and that the sharing of information will enhance the effective safeguarding of a child, young person or adult at risk. If a decision is made to share information without consent, consideration should be given to informing the individual concerned that this is going to happen, where it is appropriate to do so, and again the reason of this must be documented.

4.4. Student and Academic Services will support students at risk of harm, encouraging and empowering them to take appropriate action to mitigate that risk themselves, including seeking specialist external support. Where it is agreed that no immediate action needs to be taken under the safeguarding procedure, the Student Wellbeing Policy sets out possible further courses of action, including ongoing monitoring and referral into other procedures.

4.5. Serious safeguarding incidents may be reported to the Office for Students where they are deemed a 'reportable event' in accordance with the OfS ongoing conditions of registration. Such reports should only be made by the Registrar once the relevant external authorities have advised that it is possible to do so.

5. Allegations against a student

5.1. Where an allegation is brought against a current IML student this will be handled in accordance with the Student Disciplinary Procedure and precautionary action (such as temporary suspension) may be taken where necessary. The matter will be reported to Tower Hamlets Connect where it concerns an adult at risk and to Tower Hamlets MASH where it concerns a child or young person. An internal investigation will only take place following advice from the local authority or the Police as appropriate, so as not to prejudice any external investigation.

6. Allegations against IML personnel

6.1. In the event that there is any suspicion, allegation or apparent abuse of a child or adult at risk by a member of staff, this should be reported to the DSL as soon as possible and on the same day that the concern arises. On receipt of the report the DSL will report the incident to the Local Authority Designated Officer (LADO) for Tower Hamlets or in the case of adults at risk, to Tower Hamlets Connect and will notify the HR Manager and the School Director.

6.2. The staff disciplinary procedures will be initiated where appropriate and precautionary action (such as temporary suspension) may be taken where necessary. An internal investigation will only take place following advice from the local authority or the Police as appropriate, so as not to prejudice any external investigation.

7. Concerns about radicalisation

7.1. The process for reporting concerns about a student is at risk of radicalisation is outlined in Annex C.

8. Concerns about online abuse

8.1. If you become aware of possible online abuse, including possible grooming or sexual abuse, you should inform the DSL or Deputy DSL who will seek advice from the police and/or report the concern to CEOP and/or the Internet Watch Foundation (IWF) as appropriate. Reports of suspected online child sexual abuse images can also be made anonymously to the IWF at https://www.iwf.org.uk/en/uk-report/.

9. Concerns about individuals who are not members of the IML Community

9.1. Some of the School's activities may involve contact with children, young people or adults at risk who are not students or personnel of IML. Such activities may include educational visits to and from other organisations. Where the organisation (for example a school or other educational establishment, charity or company) has its own Safeguarding Policy, this should be followed and any concerns should be reported to the relevant Designated Safeguarding Lead.

9.2. For such activities, the organiser or main contact at IML should ascertain the contact details of the Designated Safeguarding Lead at the relevant organisation and share these details with the IML DSL. Concerns should be recorded and reported to the IML DSL as usual, who will then refer the matter to the external contact.

9.3. Where the other organisation's DSL cannot immediately be contacted, the IML DSL will take any urgent action required in order to keep the individual concerned safe. Information about the action taken will be shared with the external DSL as soon as possible.

9.4. Students undertaking work placements should ensure that they are familiar with their employer's safeguarding policy and procedures and report any concerns directly to the employer's Designated Safeguarding Lead.

10. Reporting Process Flow Chart

Member of Staff (or other personnel) becomes aware of possible abuse of a child or adult at risk*	Member of staff (or other personnel) records the concerns on the Safeguarding Concern Form and sends to DSL as soon as possible the same day	DSL reviews the report to determine whether there is a safeguarding risk (if no safeguarding risk the concern may be considered under another procedure)
Where the allegation concerns IML personnel - HR Manager notified	DSL reports the concern verbally to the Local Authority or where there are immediate safety concerns, to the Police	DSL takes any necessary steps to ensure the safety of the child or adult at risk, in cooperation with the School Director
DSL sends a written report to the Local Authority within 24 hours of the initial concern	Action plan agreed with the relevant authority and discussions recorded by the DSL	Following advice from the Police or Social Services, serious incidents reported to the Office for Students by the Accountable Officer

*Definitions of adults at risk and types of abuse are included in annex D

Annex C: Students at Risk of Being Drawn into Terrorism (Prevent)

1. Introduction

1.1. The Counter-Terrorism and Security Act places a duty on higher education providers to have due regard to the need to prevent people from being drawn into terrorism. IML is required to engage in the Prevent scheme, putting in place procedures to identify and support students at risk of radicalisation and to help reduce the security threat to the UK by preventing people from being drawn into terrorism. This includes, but is not limited to, the identification and referral of individuals at risk of being drawn into terrorism.

1.2. The Prevent counter-terrorism strategy is focused on providing practical help to stop people from being drawn into terrorism and covers all forms of extremism. Individuals identified as being at risk of radicalisation are offered support through Channel, a multi-agency scheme that offers early intervention and support.

2. Roles and Responsibilities

2.1. All members of staff at IML have a responsibility to complete regular Prevent awareness training and to report any concerns to the Prevent Lead following the process outlined below. The School's Designated Safeguarding Lead also acts as the institutional Prevent Lead and is responsible for liaising with the Department for Education, the Police and other external services related to Prevent Concerns.

2.2. The Board of Directors is responsible for ensuring that the School complies with regulatory requirements related to Prevent, including submission of the annual Prevent monitoring return and reporting any major incidents to the Office for Students.

3. Recognising risk of radicalisation

3.1. All staff are required to undertake mandatory Prevent training which includes information about the types of behaviour that may indicate that an individual has been drawn into extremism and/or terrorist activity. Some examples of behaviours and vulnerabilities[1] that may indicate that may indicate that a person is at risk include:

- being influenced or controlled by a group
- An obsessive or angry desire for change or for 'something to be done'
- Spending an increasing amount of time online and sharing extreme views on social media
- Personal crisis
- Need for identity, meaning and belonging
- Mental health issues
- Looking to blame others
- Desire for status, need to dominate

3.2. If you become aware of any criminal behaviour associated with terrorism or violent extremism (e.g. recruiting individuals to a proscribed terrorist organisation, committing or planning a violent attack guided by an extremist or terrorist organisation), you should immediately report this to the Police and inform the School's Prevent Lead that you have done so.

3.3. Some of these behaviours may not be an indication of radicalisation but may relate to broader safeguarding or welfare concerns, therefore this procedure should be considered in the context of the guidance set out in the School's Safeguarding Policy, Student Wellbeing Policy and other related policies and procedures. You should discuss the matter with your line manager if you are unsure whether to report a concern.
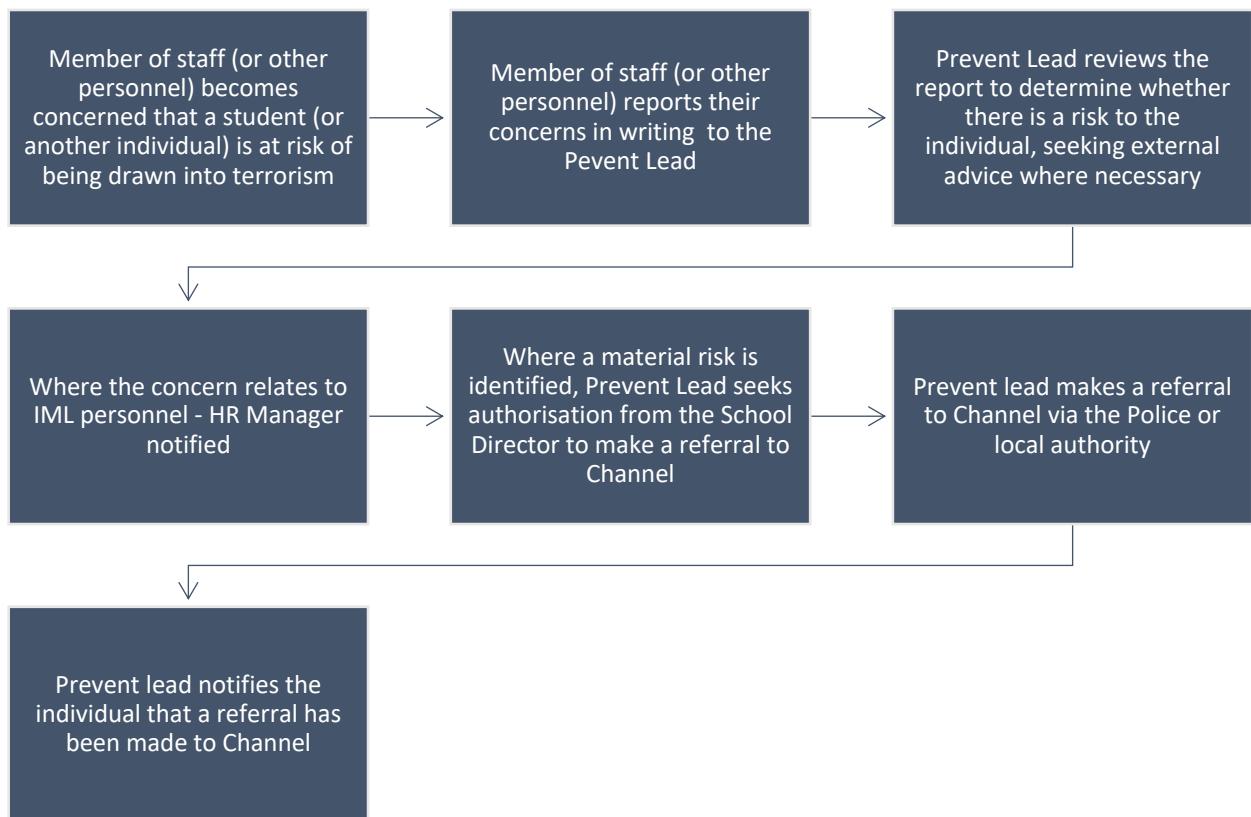
4. How to report a concern

---

[1] Taken from ACT Early (Action Counters Terrorism) https://actearly.uk/spot-the-signs-of-radicalisation/what-to-look-for/

4.1. If, having weighed up the risk of harm and contextual factors, you are concerned that a student could be at risk of radicalisation, you should make a written report to the Prevent Lead/Designated Safeguarding Lead, providing factual details about the issues that gave rise to the concern. If you have discussed those concerns with the student at risk, you should also include a record of that conversation.

4.2. The Prevent Lead will consider the information provided, seeking guidance from the DfE Prevent Regional Coordinator where necessary. If following external advice, the Prevent Lead takes the view that there is a risk to the student, they will seek the School Director's approval to refer the matter to Channel. The student will be informed of the School's decision to refer them to Channel and the reasons for this decision. Where the student is under 18, their parent(s) will also be informed.

4.3. While IML's primary Prevent duty of care is towards students, if you become concerned that a member of staff or another individual associated with the School is at risk of being drawn into terrorism, you should report this in the same way. Where the concern relates to a member of staff the Prevent Lead will liaise with the HR Manager to take appropriate steps to assess the risk and report the matter to the external authorities where appropriate.

5. Prevent Reporting Process

```
┌─────────────────────┐     ┌─────────────────────┐     ┌─────────────────────┐
│ Member of staff (or │     │ Member of staff (or │     │ Prevent Lead reviews│
│ other personnel)    │ ──▶ │ other personnel)    │ ──▶ │ the report to       │
│ becomes concerned   │     │ reports their       │     │ determine whether   │
│ that a student (or  │     │ concerns in writing │     │ there is a risk to  │
│ another individual) │     │ to the Pevent Lead  │     │ the individual,     │
│ is at risk of being │     │                     │     │ seeking external    │
│ drawn into terrorism│     │                     │     │ advice where        │
│                     │     │                     │     │ necessary           │
└─────────────────────┘     └─────────────────────┘     └─────────────────────┘

┌─────────────────────┐     ┌─────────────────────┐     ┌─────────────────────┐
│ Where the concern   │     │ Where a material    │     │ Prevent lead makes  │
│ relates to IML      │ ──▶ │ risk is identified, │ ──▶ │ a referral to       │
│ personnel - HR      │     │ Prevent Lead seeks  │     │ Channel via the     │
│ Manager notified    │     │ authorisation from  │     │ Police or local     │
│                     │     │ the School Director │     │ authority           │
│                     │     │ to make a referral  │     │                     │
│                     │     │ to Channel          │     │                     │
└─────────────────────┘     └─────────────────────┘     └─────────────────────┘

┌─────────────────────┐
│ Prevent lead        │
│ notifies the        │
│ individual that a   │
│ referral has been   │
│ made to Channel     │
└─────────────────────┘
```

Annex D: Glossary of Terms

Abuse: the types of abusive behaviours covered by this policy include:

Child Criminal Exploitation

- When a child is forced or manipulated into criminal activity including:
  - Transporting drugs or money through county lines
  - Theft
  - Vehicle crime
  - Violent crime

Child Sexual Abuse

- When a child is forced or persuaded to take part in sexual activities, including those involving physical contact or non-contact activities, online or offline

Child Sexual Exploitation

- Where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person into sexual activity in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator

Discriminatory abuse including:

- harassment
- slurs or similar treatment relating to race, gender or gender identity, age, disability, sexual orientation, religion

Domestic abuse including:

- Psychological
- Physical
- Sexual
- Financial
- Emotional abuse
- So called 'honour' based violence

Female Genital Mutilation (FGM)

- the partial or total removal of external female genitalia for non-medical reasons (also known as female circumcision)

Financial or material abuse including:

- Theft
- Fraud
- Internet scamming
- Coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions
- The misuse or misappropriation of property, possessions or benefits

Modern slavery encompassing:

- Slavery
- Human trafficking/child trafficking
- Forced labour and domestic servitude
- Traffickers and slave masters using whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment

Neglect or acts of omission including:

- ignoring medical, emotional or physical care needs
- failure to provide access to appropriate health, care, support or educational services
- the withholding of the necessities of life, such as medication, adequate nutrition, heating, clothing and shelter

Online abuse

- Abuse perpetrated via social media, text messages, emails, online chats or other interactive online media

Organisational abuse

- including neglect or poor professional practice within a care setting

Physical abuse including:

- Assault
- Hitting
- Slapping
- Pushing
- Burning
- Misuse of medication
- Restraint
- Inappropriate physical sanctions

Psychological abuse including:

- Emotional abuse
- Threats of harm or abandonment
- Deprivation of contact
- Humiliation (including initiation/hazing rituals)
- Blaming
- Controlling
- Intimidation
- Coercion
- Harassment
- Verbal abuse
- Bullying and cyber bullying
- Isolation
- Unreasonable and unjustified withdrawal of services or supportive networks

Self-neglect

- including a wide range of behaviour neglecting to care for one's personal hygiene, health or surroundings

Sexual abuse including:

- Rape
- Indecent exposure
- Sexual harassment
- Inappropriate looking or touching
- Sexual teasing or innuendo
- Sexual photography
- Subjection to pornography or witnessing sexual acts
- Indecent exposure
- Sexual assault
- Sexual acts to which an adult has not consented or was pressured into consenting to
- Online sexual abuse
- Sexual extortion (sextortion)

Voyeurism

- Recording an image beneath someone's clothing without their consent, sometimes referred to as 'upskirting'

Adult at Risk: The Care Act 2014 defines an adult at risk as any person aged 18 years and over who: has needs for care and support and; is experiencing, or is at risk of, abuse and neglect and; as a result of those care needs is unable to protect themselves from either the risk of, or the experience of, abuse and neglect. An Adult at Risk may therefore be a person who:

- Is frail due to ill health, physical disability or cognitive impairment
- Has a learning disability
- Has a physical disability and/or a sensory impairment
- Has complex mental health needs
- Has a long-term illness/condition
- Is unable to demonstrate the capacity to make a decision and is in need of care and support

Channel: A multi-agency scheme that offers early intervention and support to people at risk of being drawn into terrorism.

Child: In England a child is defined as anyone who has not yet reached their 18th birthday. This includes young people who have reached age 16, even if they are living independently.

Designated Safeguarding Lead (DSL): The member of staff named in Annex E who has overall operational responsibility for Safeguarding at IML. The DSL is responsible for ensuring that this Policy is implemented and for liaising with external authorities about safeguarding concerns.

Disclosure and Barring Service (DBS): Conducts checks on behalf of employers in England, Wales and Northern Ireland, helping them to make safer recruitment decisions and prevent unsuitable people from working with vulnerable groups, including children and young people.

Parent: includes any person with Parental Responsibility.

Personnel: For the purposes of this policy, the term 'personnel' includes those employed by IML as staff on permanent or fixed term contracts, individuals contracted to provide services as a freelancer or consultant, volunteers, company directors and those engaged as interns or on work placements at the School.

Prevent Lead: The Prevent Lead is the member of staff named in Annex E who has responsibility for ensuring that IML fulfils its obligations under the Prevent scheme (normally the same individual as the DSL).

Prevent Duty: The statutory obligation (section 26 of the Counter-Terrorism and Security Act 2015) to have due regard to the need to prevent people from being drawn into terrorism is known as the Prevent Duty.

Student: An individual enrolled on a course of study provided by IML.

Young Person: A person who has attained the age of fourteen and is under the age of eighteen years.

Annex E: Key Contacts and Useful Resources

1. Internal Contacts

Title	Name	Telephone	Email
Designated Safeguarding Lead (DSL)	Anna Licholat	02073779347	a.licholat@istitutomarangoni.com
Prevent Lead	Anna Licholat	02073779347	a.licholat@istitutomarangoni.com
HR Manager	Paola Faraci	07591338813	p.faraci@istitutomarangoni.com

2. External Contacts

Title	Name	Telephone	Email
Local Authority Designated Officer (LADO)	Melanie Benzie	020 7364 0677 07903 238827	lado@towerhamlets.gov.uk
Tower Hamlets Connect (health and social care)		0300 303 6070	enquiry@towerhamletsconnect.org
Multi-agency safeguarding hub (MASH)		020 7364 3444 / 5601 / 5606	mash@towerhamlets.gov.uk
Childrens social care emergency out of hours (after 5pm)		020 7364 5006 (Select option 3)	
Police Child abuse investigation team		020 8217 6484 (or use 999 if not available)	
Police Counter Terrorism		0800 789 321	
Tower Hamlets Prevent Engagement Officer	Mace Hoque	020 7364 6221	Mace.hoque@towerhamlets.gov.uk
DofE Prevent Regional Network Coordinator	Jennie Fisher	07880 469 588	jennie.fisher@education.gov.uk
Forced Marriage Unit		020 7008 0151	fmu@fcdo.gov.uk
NSPCC		0808 800 5000	help@NSPCC.org.uk

Useful Resources

NSPCC information on definitions and signs of child abuse: https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/

Tower Hamlets Connect adult safeguarding guidance: https://www.towerhamletsconnect.org/information-and-advice/staying-safe/safeguarding/aims-of-adult-safeguarding/

Statutory guidance on adult safeguarding: https://www.gov.uk/government/publications/care-act-statutory-guidance/care-and-support-statutory-guidance#safeguarding-1

Managing the risk of radicalisation in education settings: https://www.gov.uk/government/publications/the-prevent-

[duty-safeguarding-learners-vulnerable-to-radicalisation/managing-risk-of-radicalisation-in-your-education-setting](#)

Working Together to Safeguard Children statutory guidance:
https://www.gov.uk/government/publications/working-together-to-safeguard-children--2

Guidance on preventing radicalisation: https://actearly.uk/

Information about how to report possible terrorist activity: [https://www.met.police.uk/advice/advice-and-information/t/terrorism-in-the-uk/how-to-report-possible-terrorist-activity/](#)

Anonymous reporting form for suspected child sexual abuse images of videos: [https://www.iwf.org.uk/en/uk-report/](#)

INHOPE global network of hotlines for reporting online child sexual abuse materials:
[https://www.inhope.org/EN#hotlineReferral](#)

CEOP publishes a range of resources to help professional working in education to protect children and young people from online sexual abuse: [https://www.ceopeducation.co.uk/professionals/](#)

ISTITUTO MARANGONI LONDON
SAFEGUARDING CONCERN REPORTING FORM

This form should be used to report an allegation or suspicion about the abuse of a child or adult at risk in accordance with IML's Safeguarding Policy and Procedures.

The types of abuse reported under this procedure may include:

Discriminatory abuse	Financial or material abuse	Physical abuse
Domestic violence	Modern slavery	Psychological abuse
Female Genital Mutilation (FGM)	Neglect or acts of omission	Self-neglect
	Organisational abuse	Sexual abuse

Please refer to the School's Safeguarding Policy for further information or contact a designated safeguarding lead for advice if you are unsure whether to make a report.

Do not ask leading questions of the student and record only what is known on this form.

The information contained in this form is strictly confidential and may only be shared on a need to know basis in the best interest of a child or adult who may be at risk, or at the request of the individual concerned.

If you are concerned for the immediate safety of an individual please contact the police by calling 999.

SECTION A: TO BE COMPLETED BY THE REPOTING PERSON

1. Details of Person making the report	
Name	
Job Title	
Telephone	
Email	

2. Details of child or adult at risk	
Name	
Age (if known)	
Gender	
Phone number	
Is it safe to call the individual at risk?	Yes☐ No☐ If no, please provide further information
Does the individual know that you are sharing this concern?	Yes☐ No☐

3. Details of the allegation or concern	
Include as much factual detail as possible about the alleged or suspected abuse including: - Dates, times and locations of relevant incidents - Details of the alleged abuser(s) - Details of any witnesses - Any injuries observed - Factual observations about the appearance and behaviour of the person at risk	

Does the allegation involve a member of IML staff or an IML student?	Yes☐ No☐
Has anyone else been informed of this concern?	Yes☐ No☐ If yes, please provide further information
Any other relevant information	

Date	
Time	
Signature	

Please return this form to the Designated Safeguarding Lead:

Anna Licholat, Student and Academic Services Manager
a.licholat@istitutomarangoni.com
07719977512

SECTION B: TO BE COMPLETED BY THE DSL

5. Outcomes	
Summarise the action taken or advice given in response to the report. If no further action is required please state reasons.	
Has the concern been referred to another member of staff at IML (e.g. HR Manager or School Director)? If yes, record details including the reason for referral.	Yes☐ No☐
Has the concern been reported externally (e.g. to Tower Hamlets MASH, Tower Hamlets Connect or the Police)? If yes, record details including the reason for referral.	Yes☐ No☐
Is an internal case review required?	
DSL Name	
Date	

istitutomarangoni m

Responding to concerns about student welfare – a quick guide

Is the student in immediate danger? → **YES** → **Call the emergency services on 999**

↓ **NO**

Are you concerned that the student is at risk of radicalisation? → **YES** → **Seek advice from the Prevent Lead**

↓ **NO**

Is the student under 18 or an adult at risk*? → **NO** → **Is the student absent and unresponsive to contact?** → **NO** → **Refer to the Student Wellbeing Policy and signpost the student to Student and Academic Services for further advice**

Is the student absent and unresponsive to contact? → **YES** → **Contact Student and Academic Services with details of your concern – emergency contact procedures will be implemented where appropriate**

↓ **YES**

Refer to the Safeguarding Policy. Document what you know about the situation on a safeguarding concern form immediately and send to the Designated Safeguarding Lead or Deputy DSL

KEY CONTACTS:

Designated Safeguarding Lead (DSL)
Anna Licholat:
a.licholat@istitutomarangoni.com

Prevent Lead
Anna Licholat:
a.licholat@istitutomarangoni.com

*The Care Act 2014 defines an adult at risk as any person aged 18 years and over who: has needs for care and support and; is experiencing, or is at risk of, abuse and neglect and; as a result of those care needs is unable to protect themselves from either the risk of, or the experience of, abuse and neglect.