

Student Cause for Concern and Safeguarding Protocol

Introduction: Aims

The School has a duty of care for all students while they are studying on its programmes. That duty is to protect, with appropriate measures, their health, wellbeing and human rights so they are free from harm, abuse and neglect. This includes responding to on-site emergencies and working with students experiencing mental health difficulties to provide appropriate support to enable them to help themselves, engage and thrive as students.

All members of staff (both professional services and academic staff) are responsible for safeguarding students and should act and respond whenever and wherever concerns are observed. **If you have any concerns about a student**, it is important that you refer the matter straightaway. Please get in touch with Student Wellbeing Services (wellbeing@london.edu) or contact the relevant Programme Team.

Student-facing staff (Programme Teams, Career Centre, Student Wellbeing Services, Global Experiences) are expected to undertake suicide prevention training and familiarise themselves with this Protocol.

While it is a duty of the School as a whole to ensure a safe environment for all, it is a joint responsibility of staff in Programme Teams and Student Wellbeing Services to directly respond to, assess risk and address concerns around student welfare. Staff from other parts of the School (both professional and academic) who may have interacted with the student or raised their concerns about a student may be asked to join a safeguarding or case panel meeting. Security may also be called to support and act in cases of emergency (see **Safeguarding Protocols, Section 1: Emergencies**, page 5).

All concerns should be checked-out and shared as appropriate and this Protocol aims to outline how this should be done.

This procedure guides staff in the steps they need to initiate in making a meaningful response when a student's difficulties impact in adverse and significant ways on their engagement with their programme.

Some possible examples where a student might cause us to be concerned include:

- They behave very differently, are withdrawn or unresponsive.
- Their behaviour over time, or in a particular incident creates valid worries in those around them.
- They fail to engage with their programme of study and with others.
- They are not attending teaching or programme activities and fail to respond to communications.
- They are ill and there is a requirement for further support to be made available to them.

- They may be engaging in harassing behaviour towards other members of the community.
- They may have been subjected to harassment (this includes online bullying and harassment).
- Their behaviour causes valid health and safety concerns within the School.

Confidentiality

Every member of staff is required to treat all personal information confidentially when involved in supporting students; it is a cornerstone of any work with a student causing concern. Confidentiality is contained between the student and the members of staff directly supporting them (i.e. confidential information will be contained within the relevant Programme Team). Sharing information with others either within the School or with external services is done only with the student's consent, except for emergency situations. Where the School has concerns that the student is at risk of harm, we might reach out to the Emergency Contact. Please refer to the **Consent to Contact Policy and Procedure** which lists the kinds of risk that might require this response and the steps that staff will need to follow.

Where there are worries around breaking confidentiality, Student Wellbeing Services can advise, and specific concerns can be discussed anonymously.

Where the judgment of those supporting the student determines there is a significant risk, they will act directly on the perceived safety and welfare concerns. Where there is perceived risk to life, for example there is knowledge of suicide ideation or self-harm, those working with the student will need to prioritise the welfare of the student above the preferences of that student. If it is thought that the student presents danger to themselves or to others it may be necessary to override the confidentiality. In such cases, this will be done in consultation with the relevant Lead Safeguarding Officer, as well as the Designated Safeguarding Lead/Co-Lead.

Safeguarding Roles and Responsibilities

Safeguarding Roles	Name & email address	Role
Designated Safeguarding Lead	Sarah Druce <u>sdruce@london.edu</u>	Director, Central Services
Designated Safeguarding Co- Lead	Jane Charlton jcharlton@london.edu	Executive Director, Programmes Student Experience
Deputy Designated Safeguarding Lead	Diana Favier <u>dfavier@london.edu</u>	Associate Director, Student Wellbeing Services
Safeguarding Officer (Degree Programmes & PhD)	Harriet Alexander halexander@london.edu	Senior Student Wellbeing Services Manager
Safeguarding Officer (Degree Programmes & PhD)	Riccarda Foster rfoster@london.edu	Student Wellbeing Advisor
Lead Safeguarding Officer (MIM & MAM)	Oliver Ashby <u>oashby@london.edu</u>	Programme Director, Graduate Masters Programme

Lead Safeguarding Officer (MFA)	Kira Vorre <u>kvorre@london.edu</u>	Programme Director, MFA
Lead Safeguarding Officer (MIFFT & MIFPT)	Libby Wood <u>lwood@london.edu</u>	Programme Director, MIF
Lead Safeguarding Officer (MBA)	Helen Foley <u>hfoley@london.edu</u>	Programme Director, MBA
Lead Safeguarding Officer (EMBA London and EMBA Global)	Hannah Daniels hdaniels@london.edu	Programme Director, EMBA
Lead Safeguarding Officer (EMBA Dubai)	Zara Noor Kamileen znoorkamileen@london.edu	Programme Director, EMBA Dubai
Lead Safeguarding Officer (SLOAN)	Bryony Murdoch bmurdoch@london.edu	Programme Director, SLOAN
Lead Safeguarding Officer (PhD)	Claire van der Vegt <u>cvandervegt@london.edu</u>	Associate Director, RFO

Designated Safeguarding Lead and Designated Safeguarding Co-Lead (DSL)

- To be available as the escalation point where concerns are identified and to support decision-making in safeguarding meetings, when needed.
- Ensure training for themselves and staff is up to date (e.g. Prevent, Mental Health First Aid, Safeguarding and Supervision as appropriate), including the legal context and an awareness of procedures.
- Advise upwards, keeping senior management informed e.g. when policies need to be updated or if the expectations of the institution change.
- Advise senior management of the wellbeing needs of staff in student-facing roles and if resourcing levels do not meet the needs of the student population.
- Check that records are up to date, accurate and well detailed, this includes making sure minutes are taken for every meeting.
- Ensure effective and appropriate action plans are put in place to safeguard our students.
- Ensure that tracking systems are effective in recording cases that are live and closed.
- Improve outcomes for those students experiencing trauma or adversity e.g. academic achievement.
- Ensure that we partner with other professional organisations and refer to them when needed.
- Ensure policies and procedures are reviewed annually.

Deputy Designated Safeguarding Lead (Deputy DSL)

- Ensure the responsibilities are being delivered in line with the Safeguarding Protocol.
- Provide guidance to Lead Safeguarding Officers.
- Support the drafting of effective and appropriate safeguarding plans.
- Provide reports to Designated Safeguarding Leads.

- Ensure training for themselves and staff in Student Wellbeing Services is up to date (e.g. Prevent, Mental Health First Aid, Safeguarding and Supervision as appropriate), including the legal context and an awareness of procedures.
- To Deputise for the DSL and Co-Lead as required.
- Support the annual review and re-drafting of associated policies and procedures.

Lead Safeguarding Officer (LSO)

- Maintain overall responsibility for Safeguarding panels and plans in the Officer's respective academic programmes.
- Ensure training for themselves and staff in their team is up to date (e.g. Prevent, Mental Health First Aid, Safeguarding and Supervision as appropriate), including an awareness of procedures.
- Act as a point of contact for those who have a Safeguarding concern, receive information, assess risk to the individual, ensure those concerns are recorded.
- Draft effective and appropriate safeguarding plans.
- Ensure appropriate records are kept of any safeguarding incidents or case panel meetings for students in their respective programmes.
- In the case of serious risk, i.e. where there is perceived threat to life, complete the risk assessment template and consult with the Designated Safeguarding Leads.
- Investigate and act upon concerns as appropriate, including seeking advice or making a referral to external partners such as to the GP surgery where the student is registered or to Social Care (see section on Domestic Abuse).
- Provide information and advice to staff in their team in respect of their Safeguarding responsibilities.
- Report arising concerns and advise the DSL on any process improvements needed.
- Support the annual review of associated policies and procedures.
- Report arising Prevent concerns to the DSL.
- Support the Deputy DSL with data collation and insights for reports, including the number of cases and the types of presentation.
- Cover the duties of other LSO when they are on leave or otherwise not available.

Safeguarding Officers

- Ensure training for themselves is up to date (e.g. Prevent, Mental Health First Aid, Safeguarding and Supervision as appropriate), including the legal context and an awareness of procedures.
- Act upon concerns as appropriate, including setting up a safeguarding panel on behalf of the LSO or making a referral to external partners such as to the GP surgery where the student is registered or to Social Care (see section on Domestic Abuse).
- Act as a point of contact for those who have a Safeguarding concern, receive information, assess risk to the individual, ensure those concerns are recorded and inform the relevant Lead Safeguarding Officer

- Provide specialist knowledge and guidance, including their assessment of risk and any other information, related to the student that will support the panel in drafting safeguarding plans.
- Support the annual review of associated policies and procedures.

Limits and boundaries

School staff need to be mindful not to attempt too much. In seeking to assist students in difficulty it is possible to overreach the limits of helping, particularly where a student may be at risk of harm or harming others. Our role should be to help the student to quickly access professional help that is adequate to the severity/complexity of their difficulties and advise them to engage in the management of those difficulties.

It is not appropriate for the School to act as guardian to a student. Students are required to provide details of a person who can be contacted in an emergency when they start their programme. In rare circumstances it may be necessary to communicate with the Emergency Contact. The need to contact the Emergency Contact should be discussed and decided in a Safeguarding meeting, it is the responsibility of the relevant Programme Director to action this. See **Consent to Contact Policy and Procedure.**

Action required

- Programme Teams to share the School **Consent to Contact Policy and Procedure** with students at the beginning of their programme of study.
- Programme Teams will run regular checks in SchoolDB to identify and contact the students who have not provided the information.
- The checks will be run monthly during the first term of the programme, to ensure that all students have updated the information.
- Students are required to keep their details updated, including next of kin information, in Portal, the School's intranet, which in turn updates SchoolDB.

Recognising difficulties are normal

Staff should bear in mind what is normal and expected in day-to-day living. It can be challenging to establish at what point behaviours shift from being part of the everyday stresses and difficulties of life to becoming something that causes concern. It may be the severity of a particular behaviour, or the repetition of less intense behaviours that may generate concerns which require a response.

Student Wellbeing Services (SWS) are able to make reasonable adjustment for students where appropriate, and students can self-refer and be referred to the service, with their consent, at any point during their studies (please refer to the **Reasonable and Responsive Adjustments Procedure**). There is more information about <u>Student Wellbeing Services</u> and the resources available to students on the School's website.

Domestic abuse (comes under the UK Care Act 2014 and Federal Decree Law, No 13 of 2024 on the Protection Against Domestic Violence)

In the UK, where an adult is experiencing domestic abuse, any referrals or action taken must be the decision of the adult. However, if the adult is considered vulnerable, they are unable to protect themselves against harm or they cannot be reached by phone, the School may call the police to request a Welfare Check.

Where the adult experiencing domestic abuse has a child and lives in the UK, the School must follow its legal obligations in relation to the child and refer the matter to the local authority's Child Protection Services.

Report child abuse to a local council - GOV.UK (www.gov.uk)

In the UAE, the School must report the case to the Ministry of Education - Child Protection Unit. To report child abuse case, call either the MoE's Child Protection Unit on their dedicated number 80085 or the Ministry of Interior's Child Protection Centre on 116111 or email the report to CPU@moe.gov.ae with supporting documents, if any.

Read more on the 'Child Protection Unit' initiative.

Under Article 5 of the Law, reporting domestic violence is now an obligation on anyone who becomes aware of it, especially individuals in the field of healthcare, education and related services.

Incidents of domestic violence are to be reported to social support centres or other competent authorities, unless it involves physical or sexual violence, in which case, it must be immediately reported to the police.

Recognising impact on others

The School has a duty of care to ensure all students are safeguarded from distress or harm by the behaviour of other students. A student who is judged to be disrupting the wellbeing and progress of other students may be a cause for concern and therefore this procedure would be invoked (see examples on page 1). In other cases, it may be necessary to follow the Student Disciplinary Procedure, as appropriate.

Safeguarding Protocols

1. Emergencies

Where student behaviour gives cause for serious and immediate concern – on campus - such as:

- Indicating immediate and significant risk to the student or others.
- Active talk of suicide, e.g. active plans to end their life.
- Student needs urgent medical attention.
- Student at clear risk of harm from others.

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• Seeming out of touch with reality e.g. hallucinations, hearing voices.

What to do:

In the UK, contact the emergency services by calling Security on ext. 7999 / direct dial: 020 7000 7999.

In the UK, if there is a delay in getting through to Security, call **999** and inform Security as soon as possible afterwards.

In Dubai, contact the emergency services by calling DIFC Security on +97143622299.

In Dubai, if there is a delay in getting through to Security, call **998 for an ambulance or 999 for police,** and inform Security as soon as possible afterwards.

Security staff in both London and Dubai are First Aid trained; they will call the emergency services and will provide first aid (if required) while waiting for the emergency services to arrive.

The member of staff who is made aware of the emergency/serious & immediate risk has responsibility for following the procedure to the end/or the point at which the student has been passed on to the emergency services.

The member of staff will notify the relevant Lead Safeguarding Officer (LSO) or Student Wellbeing Services, who will ensure a **Safeguarding Panel** (see section 5) is convened, will decide who should attend and will complete the risk assessment template if required. **See Appendix 2** Setting Up & Managing A Safeguarding Panel

If the relevant LSO is unavailable, another LSO from a different programme will assume responsibility for the case in their absence.

The Safeguarding Panel will decide when and how to contact the student's Emergency Contact and agree any action plans. See **Consent to Contact Policy and Procedure.**

2. Urgent response situations

A situation that demands an immediate response and follow-up but does not require emergency services.

Examples of serious concern:

- the student is safe from immediate risk but there are indications or a history of suicidal ideation or self-harm, though no active plan
- the student appears very distressed
- the student/ their behaviour is causing high levels of concern to friends, colleagues, Programme Team.

What to do:

Signpost the student to 24hr emergency support.

If those involved in the situation are not confident in assessing whether the situation is an actual emergency, it is out of hours and no other appropriate staff are available, call Security (in London on ext. 7999 / direct dial: 020 7000 7999 or in Dubai +97143622299 who should then call 999 in London or 998/999 in Dubai.

The staff involved should then inform the relevant Lead Safeguarding Officer or Student Wellbeing Services, who will ensure a **Safeguarding Panel** (see section 5) meeting is convened and decide who should attend. (**See Appendix 2** Setting Up & Managing A Safeguarding Panel)

If the relevant LSO is unavailable, another LSO from a different programme will assume responsibility for the case in their absence.

3. Ongoing concerns

Ongoing concerns may be a result of an emergency or urgent incident or accumulated concerns.

Ongoing concerns must be shared within the relevant Programme Team and not be kept confidential by the member of staff or faculty who has knowledge of the situation. The Programme Director will decide who needs to be kept informed of any concerns.

Examples of issues causing ongoing concern which are not an emergency or urgent incident:

- failure to engage with the programme, not turning up to meetings, exams, sessions
- excellent academic performance at the start of the programme followed by significant drop in grades
- poor academic performance
- poor health
- sleeping on campus
- continuous falling asleep during the day
- constant complaints, feeling persecuted (i.e. IT not working for them)
- serious study group issues
- other people sharing concerns

What to do

Programme Team staff who are aware of an ongoing concern will escalate to their Senior Manager and/or Programme Director. The Programme Director may consult with Student Wellbeing Services to confirm if the student is registered with them. If the student is not known to Student Wellbeing Services, the Programme Team will encourage the student to reach out to them for support.

If Student Wellbeing Services have an ongoing concern, they will escalate to the relevant Senior Manager and/or Programme Director.

Ongoing concerns may require a **Case Meeting** (see section 6, page 9).

Where the ongoing concern is assessed as an emergency or urgent incident and there are concerns about a student's safety, a safeguarding panel will need to be convened (See Appendix 2 Setting up & Managing a Safeguarding Panel)

4. When students fail to respond to contact

Where students we are concerned about fail to respond to contact, friends and peers of the student may be asked. If it is not possible to verify their welfare and there is knowledge of serious risk, the relevant Programme Director may contact the student's Emergency Contact, which the student would have provided at the beginning of their programme (Refer to Consent to Contact Policy and Procedure). If the student's welfare is still not verified, and the Emergency Contact cannot be contacted/does not respond, this may become a police matter. The Programme Director will need to call Police on 999 who will assess whether a welfare check at the student's address is required.

If concerns around mental health and wellbeing persist, the Programme Director (LSO) in consultation with the DSLs and the Student Wellbeing Services will consider whether to invoke the Fitness to Study Policy (Student Wellbeing Services page on Canvas).

5. Safeguarding Panels (for high-risk cases only such as suicide ideation and self-harm)

Key people

The student's Programme Director, in their role as Lead Safeguarding Officer (LSO) and members of the Student Wellbeing Services team will normally form the foundation for the students' pastoral support and safeguarding plan. Other members of staff may also become involved depending on the details of the case, the following list is not exhaustive:

- Other Programme Team staff
- Designated Safeguarding Lead
- Designated Safeguarding Co-Lead
- Deputy Safeguarding Lead
- Relevant Academic Director, in instances where academic progression may be impacted.
- Relevant Career Coach or Student Counsellor
- Head of Quality Assurance
- Associate Dean, Programmes
- Deputy Dean, Programmes
- School Secretary

The programme LSO will complete the risk assessment template, where there is a perceived risk of suicide and knowledge of self-harm and will decide who should attend a Safeguarding Panel. The relevant Lead Safeguarding Officer will seek input from the Designated Safeguarding Leads or the Deputy DSL.

The **Safeguarding Panel** will discuss concerns and agree a course of action. The Panel should be comprised of: the relevant programme Lead Safeguarding Officer (LSO) and another

member of the programme team who is close to the student case; a member of staff representing Student Wellbeing Services, which will likely be the member of staff in SWS supporting the student. Depending on the case, the relevant programme LSO may wish to invite other members of staff listed above.

The LSO will consult with DSLs to decide if the following people should be included Head of Quality Assurance, Deputy Dean, Programmes, School Secretary.

Please refer to:

- Risk Assessment Template
- Appendix 1 Safeguarding Reporting Process
- Appendix 2 Setting Up and Managing A Safeguarding Panel
- Appendix 3 Guidance on how to deal with a situation where a member of staff has a virtual appointment with a student who discloses plans to end life.
- Appendix 4 Suicide pathway model and risk factors

6. Case meetings

Where the ongoing concern is less urgent, i.e. there are no immediate concerns about the student's safety, a case meeting may be called to discuss the issues and to provide a prompt response. The case meeting will include: the relevant Programme Director and Stream/Programme Manager and a member of Student Wellbeing Services, if required.

If the matter is affecting the student's academic progression, the relevant Academic Director and a member of the Quality Assurance team may also need to be included.

In setting up a case meeting:

- Create a private outlook calendar invite, subject line 'Case Meeting, student number'.
- Set up a Case Meeting record on MSTeams under the relevant programme, with the student LBS number as a title.
- Grant access to the Case Meeting channel for this student to those required for the panel only, which includes the Lead Safeguarding Officers, Programme Team staff and a Student Wellbeing Services representative, if required.
- PT staff will record a summary of the meeting on the channel.

Prepare the following for the meeting:

A summary of issue: to protect staff from potentially triggering	
conversations it is advised that high-level information is sufficient e.g.,	
there is long term history of abuse, and staff exercise judgement in	
sharing details of the case, limiting this to information that is helpful to	
agreeing an appropriate safeguarding plan.	PT staff, SWS
Student transcript and anything else that highlights academic	
performance and completion of degree and programme requirements	PT staff

Attendance records to show whether the student have been engaging	
with all aspects of their programme, including careers events, coaching	
and interviews	PT staff

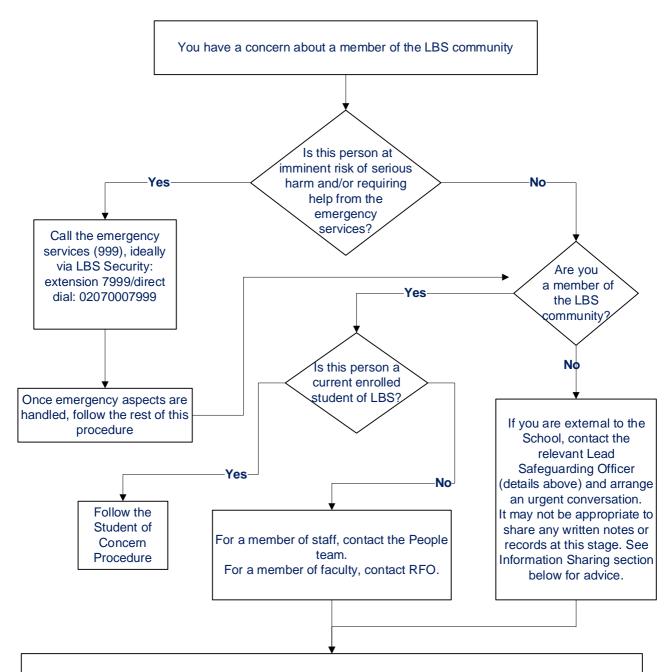
7. Advice on information sharing for safeguarding concerns and record keeping

- Keep shared information to a minimum and to what is salient, i.e. limit what is shared to information that is required to make a decision.
- Ensure any notes or reports relating to the safeguarding concern are stored appropriately, which includes access for only those that need it, storing only what is needed, and ensuring data is used only for the intended purpose (safeguarding).
- Share records in a secure manner.
- Keep a record of all the steps you have taken and the reasons for it, ensuring this is stored securely.

Appendices

Appendix 1

Safeguarding Reporting Process



The relevant LSO or Student of Concern Procedure will manage the case. Case management will include:

- Gathering all available relevant information about the concern
- Considering referral to other agencies that also have a duty of care and with whom liaison is required to managed risk (e.g. Social Care, NHS, GP, Prevent)
- Arranging for appropriate pastoral and academic support (for students) to be provided and following up with this as necessary
- Seeking advice from the Designated Safeguarding Lead or Co-Lead if required (for students)
- Ensuring appropriate record keeping

Appendix 2

Setting up and managing up a Safeguarding Panel meeting

Staff should follow this <u>tem plate</u> for emergency (high risk) or urgent response situations (medium risk), this means there is perceived risk of suicide or knowledge of self-harm.

Appendix 3

If your interaction with the student takes place virtually, e.g. on a Zoom/Teams call, and the student speaks of plans to end life

The member of staff should remain on the call with the student and guide them to seek help. This may include:

- Encouraging the student to call their GP or local mental health team to arrange an emergency appointment, and waiting while they make the call
- Encouraging the student to call the emergency services
- If the student is unable to call the GP or the emergency services, the member of staff, with the student's permission, will make the call and send the emergency services to the student's address.

If the student is not based in the UK, the member of staff may need to search online what emergency services and suicide prevention helplines are available where the student is and encourage the student to use them.

After de-escalation of the situation, the member of staff will:

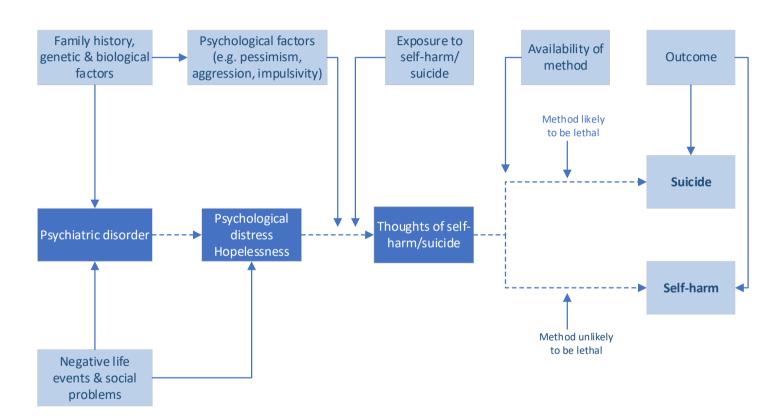
- send a follow-up email to the student, signposting 24hr support (see **Appendix 2**, for standard text for students present in the UK)
- report the incident to the relevant Lead Safeguarding Officer
- make further appointment with the student to check-in the next day. If the member of staff does not have availability themselves, ensure another member of their Programme Team or of the Student Wellbeing Services team will meet with the student
- Set up a Safeguarding Panel meeting (see **Appendix 2**).

Appendix 4

Suicide pathway model and risk factors

Suicide pathway model

Suicide can result from a range of factors, including, for example, psychiatric disorder, negative life events, psychological factors, alcohol and drug misuse, family history of suicide, physical illness, exposure to suicidal behaviour of others, and access to methods of self-harm. In any individual case multiple factors are usually involved.



No one is immune to suicide. People with depression are at particular risk for suicide, especially when risk factors are present. Previous self-harm (i.e. intentional self- poisoning or self-injury, regardless of degree of suicidal intent) is a particularly strong risk factor. Also, a number of other risk factors for suicide have been identified and should be considered. Family history of suicide or self-harm is particularly important. There are also some factors which may offer some degree of protection against suicide.

Risk factors	Possible protective factors
 Family history of suicide or self-harm. Physical illness (especially when this is recently diagnosed, chronic and/or painful). Exposure to suicidal behaviour of others, either directly orvia the media. Recent discharge from psychiatric inpatient care. Access to potentially lethal means of self- harm/suicide. Family history of mental disorder. History of previous suicide attempts (this includes self-harm). Severe depression. Anxiety. Feelings of hopelessness. Personality disorder. Alcohol abuse and/or drug abuse. Male gender. 	 Family/partner support Social support. Religious belief. Being responsible for children (especially young children).

When trying to assess risk of suicide or self-harm you may want to ask about a number of topics, starting with more general questions and gradually focusing on more direct ones, depending on the person's answers. This must be done with respect, sympathy and sensitivity. It may be possible to raise the topic when the person talks about negative feelings or depressive symptoms. It is important not to overreact even if there is reason for concern. Areas that you may want to explore include:

- Are they feeling hopeless, or that life is not worth living?
- Have they made plans to end their life?
- Have they told anyone about it?
- Have they carried out any acts in anticipation of death (e.g. putting their affairs in order)?
- Do they have the means for a suicidal act (do they have access to pills, insecticide, firearms...)?
- Is there any available support (family, friends, carers...)?

There is increasing evidence that visual imagery can strongly influence behaviour. Therefore, it is worth asking whether a person has any images about suicide (e.g. "If you think about suicide, do you have a particular mental picture of what this might involve?"). While assessment of risk factors for suicide in people can inform evaluation of risk, it is also important to pay heed to non-verbal clues and one's intuitive feelings about a person's level of risk.

Sometimes people with few risk factors may nevertheless make us feel uneasy about their safety. We should not ignore these feelings when assessing risk, even though they may not be quantifiable.