



SAFEGUARDING POLICY

FEBRUARY 2020

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INTRODUCTION

London Film Academy (LFA) has a social, moral and statutory duty to ensure that it functions with a view of protecting, safeguarding and promoting the welfare of all applicants, registered students, employees, tutors, contractors, interns and visitors to the premise who may be at risk of harm or wish to disclose allegations of harm. Special attention is given to children/young people and adults at risk.

LFA advocates a holistic approach to safeguarding appropriate for its size, through assessment and proportional management of risk, and integration of good safeguarding practices in all activities.

LFA also recognises that it has duties and responsibilities relating to the protection and fair treatment of its students and, as an employer, to its staff. Therefore, should allegations of harm and or inappropriate behaviour be levelled against a student or staff, LFA will afford that student or staff member the necessary support as is appropriate in the circumstance arising.

The Prevent duty requires relevant higher education bodies to have due regard to the need to prevent people from being drawn into terrorism. LFA takes this duty very seriously and has created the following policies and procedures in order to address this duty. Compliance is currently monitored by Office for Students (OfS).

LFA's policies and procedures observe the relevant statutory duties and guidance documents, and are informed by any known evidence of good practice across the higher education sector. This policy is set out with specific reference to *Higher Education and Research Act 2017*, *Working Together to Safeguard Children 2018*, *National Framework of Standards for Safeguarding Adults, ADSS 2005*, *Care Act 2014* and *Keeping Children Safe in Education 2019*, and the *Counter-Terrorism and Security Act 2015 (the Prevent Duty)*.

Although LFA accepts individuals under the age of 18 on to its programmes of study, it does not accept parental responsibility for a child and will not act in loco parentis. Parents or guardians of students under the age of 18 are required to follow the appropriate waiver procedure during the application process.

This policy is to be used in conjunction with the following LFA's policies and guidance documents:

- [LFA Student Handbook](#)
- LFA Staff Handbook
- LFA Tutor Handbook
- [LFA Freedom of Speech Policy](#)
- [LFA External Speakers & Events Policy](#)
- [LFA Equal Opportunities Policy](#)
- [LFA Privacy Policy](#)
- [LFA Complaints Policy](#)
- LFA Personal Relationship Code of Conduct
- [Universities UK guidance on External Speakers in Higher Education](#)
- [The Prevent Duty: Guidance for Higher Education Institutions in England and Wales](#)
- [OfS Evaluation of Safeguarding Students Catalyst Fund Projects](#)



DEFINITIONS

Children and young people – anyone under the age of 18

Adult – anyone 18 or over including anyone whose life circumstances temporarily make them vulnerable and in need of safeguarding

Adults at Risk – anyone aged 18 or over who may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to care of themselves, or unable to protect themselves against significant harm or exploitation

PRINCIPLES

LFA is committed to ensuring that it provides a safe environment from harm for all applicants, registered students, employees, contractors and visitors. LFA considers harm to range from harassment to abuse to radicalisation.

In pursuit of these aims, LFA will approve and regularly review policies and procedures with the aim of:

- Raising awareness of issues relating to the welfare of and promotion of a safe environment;
- Aiding the identification of those at risk of significant harm, and providing procedures for reporting concerns;
- Demonstrating due regard for the need to prevent people from being drawn into terrorism;
- Creating accessible procedures for reporting and dealing with allegations against anyone;
- The safe recruitment of staff.

This policy focusses on information and guidance on **abuse and radicalisation**. Some examples of types and signs of:

- abuse - can be found in Appendix 1
- radicalisation - can be found in Appendix 2.

For information and guidance on **harassment and bullying, and discrimination** are referred to in our Equal Opportunities Policy and involve the Complaints Policy. These policies can be found on the [LFA website](#).

In developing this Safeguarding Policy and its procedures, LFA has consulted with, and take account of, guidance issued by the OfS, the Regional Prevent Coordinator, Local Safeguarding Children Board for Kensington and Chelsea, Hammersmith & Fulham and Westminster, Social Services Department, Child Protection Unit of the police, Adult Social Care Services, and other relevant bodies and groups.

ACADEMIC BOARD AND SENIOR MANAGEMENT COMMITTEE

A quarterly Safeguarding report, which details all issues relating to safeguarding, is received by the Academic Board. The Academic Board receive an annual update on the development, approval and review of LFA policies and procedures relating to the safeguarding.

DESIGNATED SAFEGUARDING PERSON AND PREVENT LEAD

LFA has designated senior members of staff with the responsibility for all safeguarding issues relating to all individuals within the scope of this policy.

DESIGNATED SAFEGUARDING PERSON

Vice Principal is Designated Safeguarding Person for LFA and Joint Principal (DG) is the Deputy Designated Safeguarding Person.

The Designated Safeguarding Person is responsible for:

- Leading on the implementation and promotion of this policy;
- Acting as the main point of contact within LFA on matters of safeguarding;
- Ensuring that the policy is monitored and reviewed in accordance with changes in legislation and guidance on the protection of children and adults at risk;
- Raising awareness of issues relating to the welfare of children and adults at risk, and the promotion of a safe environment for the children, young people and adults at risk learning within LFA;
- Liaising with the Prevent Lead (where appropriate) to oversee the referral of cases of suspected abuse, extremism, radicalisation or allegations to the local safeguarding children board, adult social services, government Prevent co-ordinators or other relevant investigating agencies as appropriate;
- Maintaining confidential records of any safeguarding referral, complaint or concern (even where that concern does not lead to a referral);
- Ensuring that everyone within LFA are aware of LFA's Safeguarding policy and procedure and that it is published publicly on LFA's website;
- Liaising with Local Authority Designated Officer and other appropriate agencies where required.

PREVENT LEAD

The Head of Operations and Human Resources is the Prevent Lead for the LFA. Joint Principal (DG) is the Prevent Accountability officer.

The Prevent Lead is responsible for:

- Reporting on matters relating to Prevent Duty within Senior Management Committee (SMC) and Student Staff Liaison Committee
- Maintaining Prevent Risk Assessment and Action Plan
- Raising awareness of changes to risk or government policy to Safeguarding Lead and SMC
- Acting as the main point of contact within LFA on matters of Prevent
- Overseeing Prevent training including scheduling and inductions
- Conducting fair honest investigations into Prevent related concerns and making the appropriate referrals
- Risk assessing and approving external speaks and events whilst upholding freedom of speech
- Maintaining confidential records of any Prevent referral, complaint or concern (even where that concern does not lead to a referral);



- Liaising with the Regional Prevent Coordinator and other appropriate agencies where required
- Providing advice and support to stakeholders on issues relating to Prevent

TRAINING AND SIGNPOSTING

Safeguarding Young People Colleges and Universities – Level 2 (CPD Certified) has been undertaken by Head of Academic Governance and Prevent Duty training is compulsory for all relevant employees and contractors and comes from an accredited provider. Refresher courses will take place every three years. The Designated Safeguarding Person will undertake training in inter-agency working on all aspects of safeguarding.

LFA currently has two certified Mental Health First Aiders. They are the Joint Principal (DG) and Head of Operations & HR who also have completed Prevent training. In addition, LFA currently has two course coordinators (in charge of our longer courses) who are Mental Health Ambassadors and have completed Prevent training.

The Prevent Lead regularly meets with employees and is trained to recognise signs and discusses any welfare concerns including Prevent-related welfare concerns. Prevent Lead participates in the quarterly Staff-Student Liaison committee meeting. The Prevent Lead regularly liaise with the DfE Regional Prevent Coordinator.

All permanent employees and contractors including members of the course team and personal tutors are trained in Prevent. This includes identifying any indications that someone could be vulnerable and at risk of being drawn into terrorism. Relevant lone workers are also required to complete Prevent training. All this is administered by the Prevent Lead.

Signposting around the school directs all people on site about who the Prevent Lead is for raising concerns.

RISK ASSESSMENTS

LFA's Prevent risk assessment and action plan is designed to consider the specific risk relating to radicalisation and is reviewed on an annual basis in February of each year.

LFA strives to produce a safe and secure environment. Health and Safety risk assessments take into account the individuals involved and although LFA does not act in loco parentis it does make specific additional provision for children and adults at risk.

MONITORING AND REVIEW

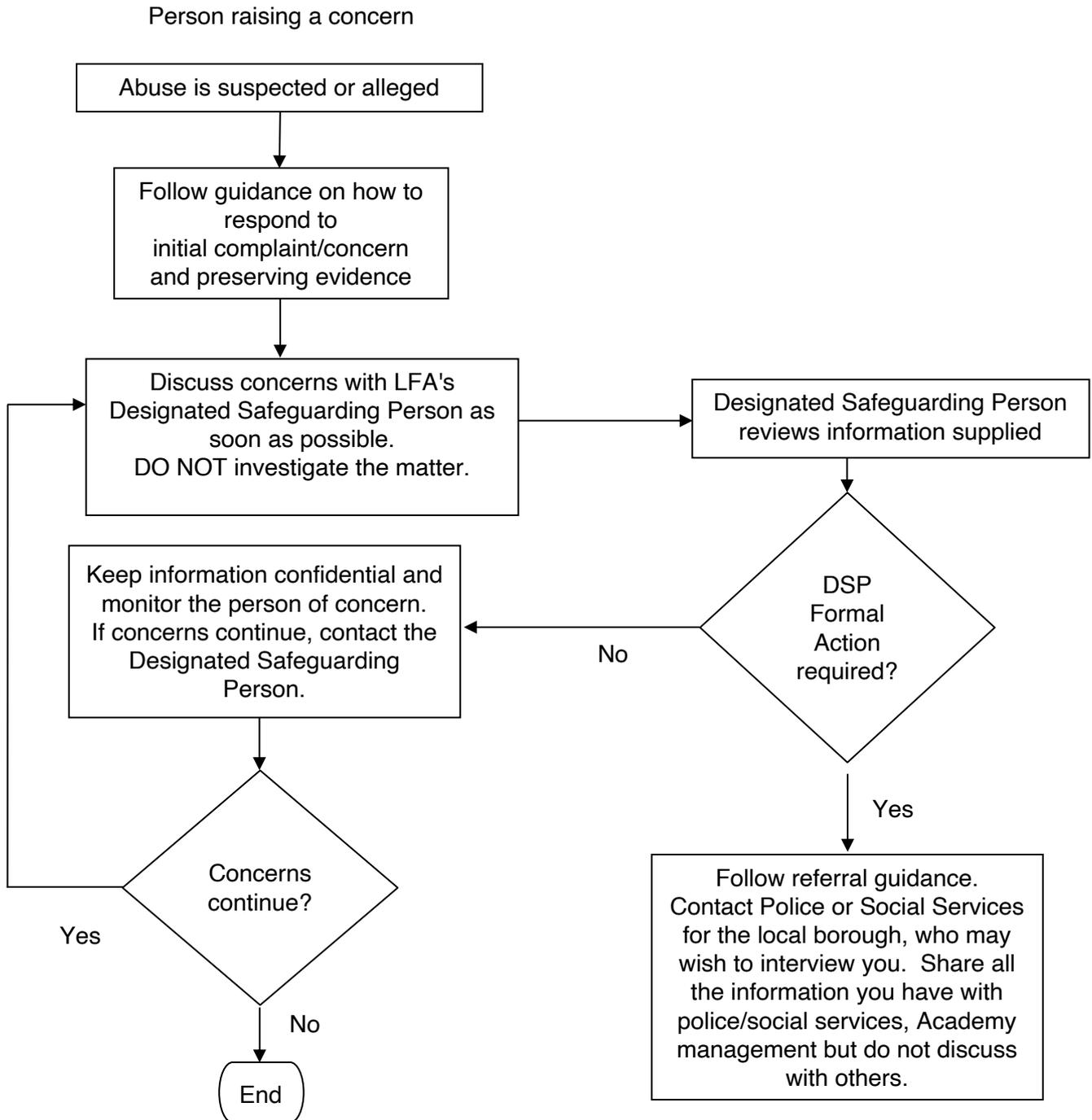
Where an allegation has been made against an employee or contractors, Academic Board or Senior Management Committee should, at the conclusion of the investigation and any disciplinary procedures, consider whether there are any matters arising from it that could lead to the improvement of LFA's procedures and/or policies and/or which should be drawn to the attention of the LFA Board of Governance. Consideration should also be given to the training needs of staff.

This policy is reviewed by the Senior Management Committee annually in February, which is several months before the new student handbook is released in May.

ABUSE CONCERN PROCEDURE

There are two distinct LFA procedures for safeguarding concerns and this procedure is for concerns relating to abuse as they are distinct from radicalisation (see Prevent Concern Procedure). Example of types and signs can be found in the appendixes of this document.

FLOWCHART FOR PROCESS FOR RAISING A CONCERN ABOUT AN INDIVIDUAL



INITIAL COMPLAINT

If you suspect abuse or hear a complaint of abuse. You must:

- listen carefully to the complainant and keep an open mind. You should not take a decision as to whether or not the alleged abuse has taken place;
- not ask leading questions, that is, a question which suggests its own answer;
- reassure the complainant but not give a guarantee of absolute confidentiality. You should explain that you need to pass the information to the Designated Safeguarding Person who will ensure that the correct action is taken.
- keep a sufficient written record of the conversation. The record:
 - should include the date, time and place of the conversation,
 - should include the essence of what was said and done by whom and in whose presence.
 - should be signed by the person making it and should use names, not initials.
 - be kept securely and handed to the Designated Person;
- maintain confidentiality and not discuss the matter with anyone other than the Designated Safeguarding Person.

PRESERVING EVIDENCE

All evidence, (for example, scribbled notes, and mobile phones containing text messages, clothing, and computers), must be safeguarded and preserved.

REPORTING

All suspicion or complaints of abuse must be reported to the Designated Safeguarding Person or Deputy Designated Person, or if the complaint involves the Designated Person, to the Joint Principal. You must not assume someone else will do it.

ACTION BY THE DESIGNATED PERSON

A Designated Safeguarding Person investigation must take into account:

- the nature and seriousness of the suspicion or complaint. A complaint involving a serious criminal offence will always be referred to the Social Services Department (SSD) or the police without further investigation within LFA;
- the need to protect from harm and the need to protect from false or unfounded allegations;
- the wishes of the person who has complained, provided that that person is of sufficient understanding and maturity and properly informed. However, there may be times when the situation is so serious that decisions may need to be taken, after all appropriate consultation, that override their wishes;
- if the complainant is a child or young person, the wishes of their parents provided they have no interest which conflicts with the complainant's best interests and that they are properly informed. Again, it may be necessary, after all appropriate consultation, to override parental wishes in some circumstances. If the Designated Safeguarding Person is concerned that disclosing information to parents would put a child or young person at risk, they will take further advice from the relevant professionals before making a decision to disclose;
- duties of confidentiality, so far as applicable;

- the lawful rights and interests of LFA community as a whole, including its employees and its insurers;
- if there is room for doubt as to whether a referral should be made, the Designated Safeguarding Person may consult with the Local Authority Designated Officer (LADO) or other appropriate professionals on a no-names basis. However, as soon as sufficient concern exists that a child or adult at risk may be at risk of significant harm, a referral will be made without delay. If the initial referral is made by telephone, the Designated Person will confirm the referral in writing to SSD within 24 hours. If no response or acknowledgment is received within three working days, the Designated Person will contact SSD again.

SUSPENSIONS

A student against whom an allegation of abuse has been made may be suspended from LFA during the investigation and LFA's policy on behaviour, discipline and sanctions will apply. LFA will take advice from the LADO on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all involved including the student or students accused of abuse.

REFERRAL GUIDELINES

- LFA will refer concerns that a child or young person may be at risk of significant harm from someone connected to the LFA to the Local Authority Designated Officer (LADO) for London Borough of Hammersmith and Fulham.
- If the alleged abuse is not perpetrated by someone connected to the LFA then they should contact the LADO for the child's or young person's home borough.
 - If that information is not available to the LFA they can contact the LADO for Hammersmith and Fulham for consultation or advice.
- The LADO will in turn instruct LFA as to what they should do next. Contact details can be found at the end of this document.
- If it is necessary for a child to be interviewed by the police in relation to allegations of abuse, LFA will ensure that, subject to the advice of the LADO, parents are informed as soon as possible and that the child is supported during the interview by an appropriate adult. In the case of child whose parents are abroad, the Child's guardian will be requested to provide support to the student and to accommodate them if it is necessary to suspend them during the investigation.
- Whether or not LFA decides to refer a particular complaint to the SSD or the police, the parents and child will be informed in writing of their right to make their own complaint or referral to the SSD or the Child Protection Unit of the police and will be provided with contact names, addresses and telephone numbers, as appropriate.
- For vulnerable adults the appropriate SSD will be contacted.
- For adults the police alone will be contacted.

A referral to the SSD or police will not normally be made where:

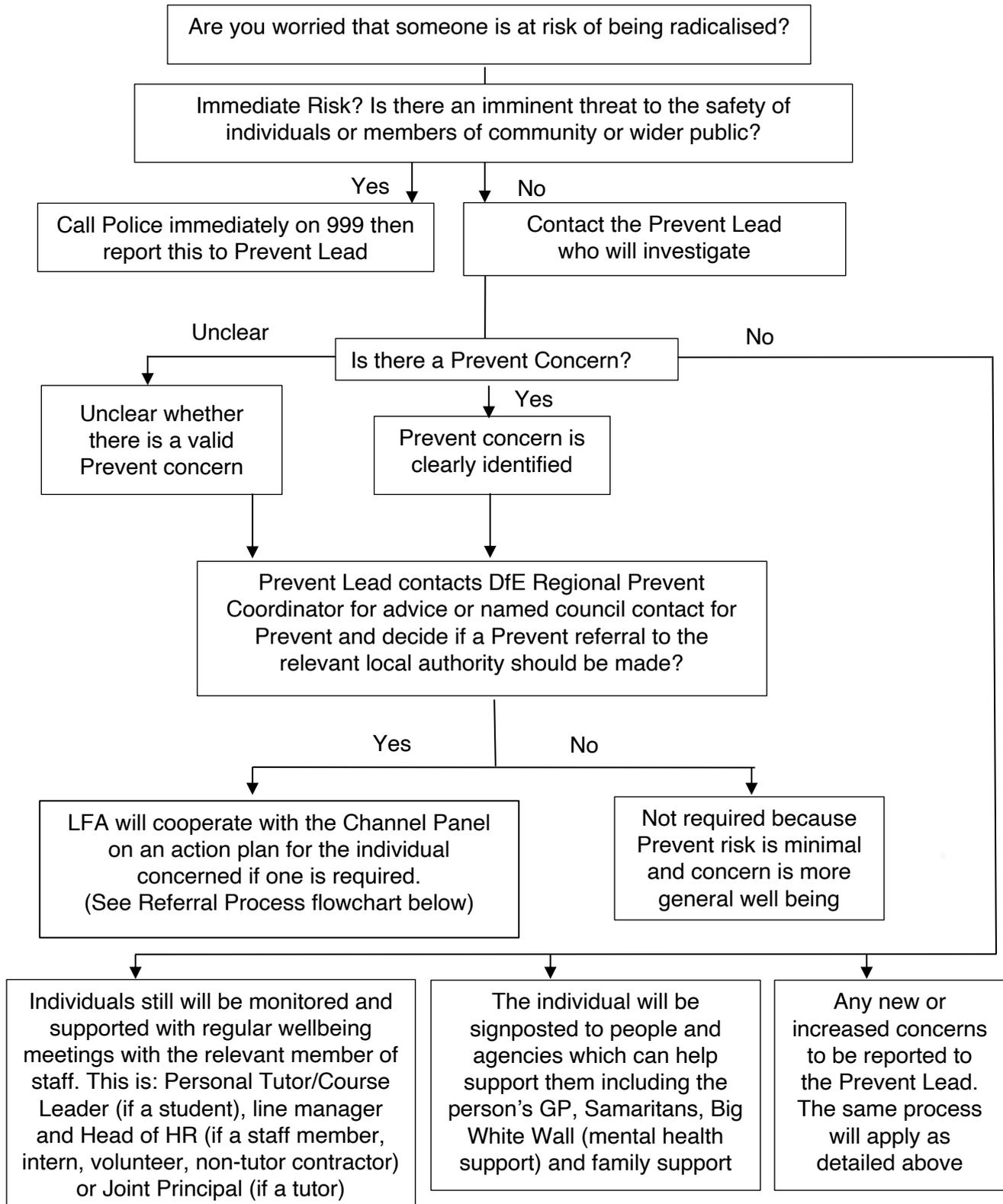
- the complaint does not involve a serious criminal offence; and
- a referral would be contrary to the wishes of the complainant who is of sufficient maturity and understanding and properly informed; and
- if applicable, contrary also to the wishes of the complainant's parents; and
- the case is one that can be satisfactorily investigated and dealt with under LFA's internal procedures, the parents being kept fully informed, as appropriate.



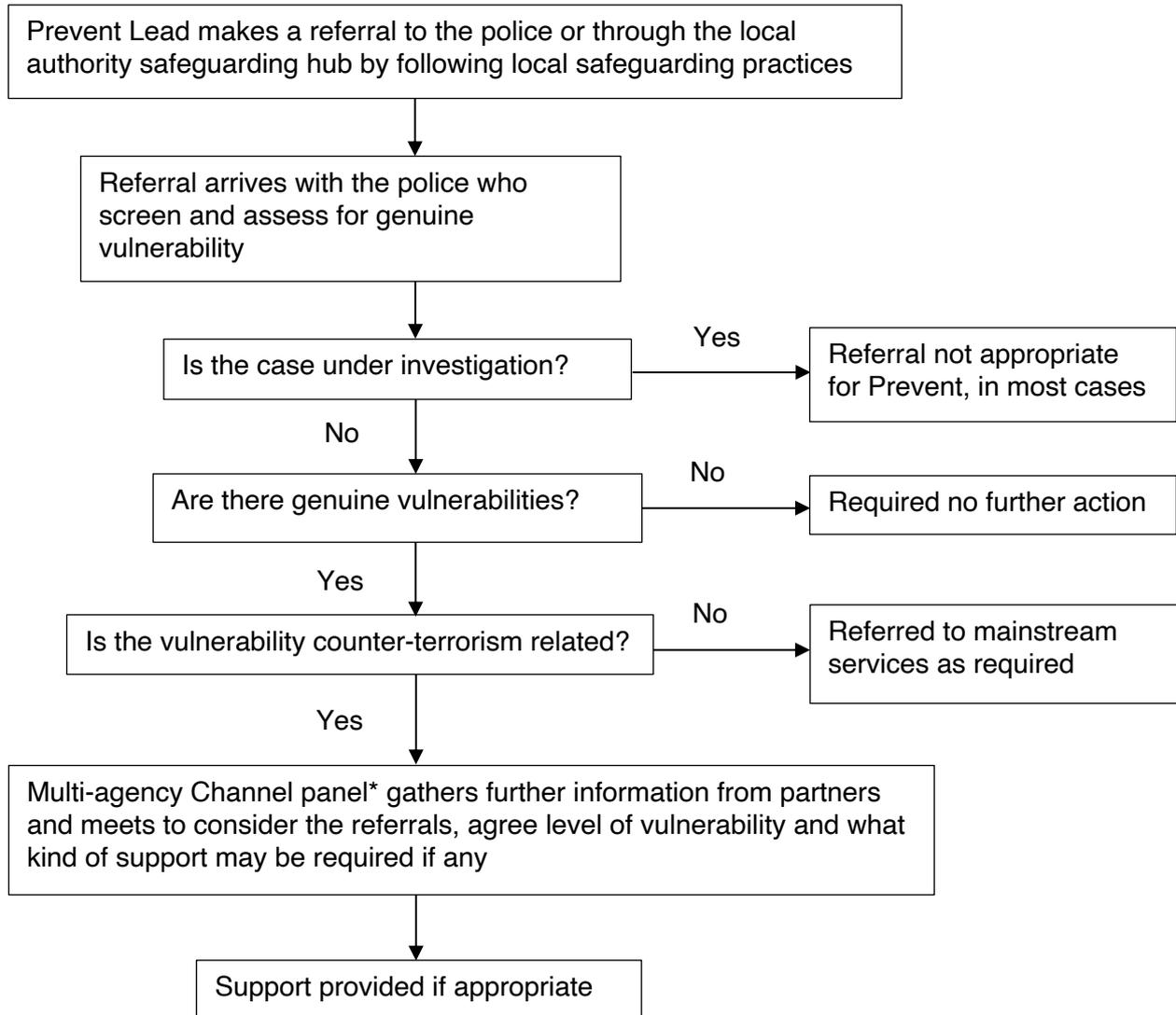
PREVENT CONCERN PROCEDURE

There are two distinct procedures for safeguarding concerns and this procedure is for concerns relating to radicalisation as they are distinct from abuse (see Abuse Concern Procedure). Example of types and signs can be found in the appendixes of this documents.

FLOWCHART FOR IDENTIFYING PREVENT RISKS IN AN INDIVIDUAL



CHANNEL REFERRAL PROCESS



*A Channel panel is chaired by the local authority and made up of representatives from different safeguarding areas including health, education and the police. The Channel panel meet to discuss each case and carefully assess the extent of the potential vulnerability of the individual. In other cases the panel will offer the individual a support package tailored to their needs.



INITIAL COMPLAINT

If you suspect or hear a concern of radicalisation. You must:

- listen carefully to the person raising the concern and keep an open mind. Do not take a decision as to whether the concern of radicalisation is true;
- not ask leading questions, that is, a question which suggests its own answer;
- reassure the person with the concern but do not give a guarantee of absolute confidentiality. They should explain that they need to pass the information to the Prevent Lead who will ensure that the correct action is taken;
- keep a sufficient written record of the conversation. The record should include the date, time and place of the conversation and the essence of what was said and done by whom and in whose presence. The record should be signed by the person making it and should use names, not initials. The record must be kept securely and handed to the Prevent Lead.

PRESERVING EVIDENCE

All evidence, (for example, scribbled notes, and mobile phones containing text messages, clothing, and computers), must be safeguarded and preserved.

REPORTING

All suspicion or complaints of radicalisation must be reported to the Prevent Lead or Prevent Accountability Officer, or if they cannot be found the Designated Safeguarding Person who will in turn pass on the concern to the Prevent Lead.

ACTION BY THE PREVENT LEAD

- Gather information
- Assess if there is a Prevent concern
- Contact the Regional Prevent Coordinator (RPC) or named council contact
- Decide if Prevent referrals should be made
- Follow the advice or instructions of the LPC and ensure that appropriate steps are taken to deal with the person in question

REFERRAL GUIDELINES

- Whether there is a valid Prevent concern or if it is unclear the Prevent Leads should contact the Regional Prevent Coordinator or named council contact for advice
- If the Prevent Lead decides that a referral to the local authority should be made then the LFA will cooperate with the Channel Panel on an action plan for the individual concerned.
- If the Prevent is not a concern or minimal, or the concern is more about general wellbeing then the following steps can be taken:
 - The individual will be monitored with regular wellbeing meetings with the relevant member of staff



- The individual will be signposted to people and agencies which can help support them including their GP, Samaritans, Big White Wall and their family support

Any new or increased concerns arising at any point in this process must be reported to the Prevent Lead.

If there is an immediate threat to the safety of the individual or members of the community or wider public then the police should be contacted immediately before reporting it to the Prevent Lead.

CONTACT INFORMATION

Designated Safeguarding Person

Simon Flynn

Email: viceprincipal@londonfilmacademy.com

Tel: 0207 386 7711

Prevent Lead

Amber Panting

Email: prevent@londonfilmacademy.com

Tel: 0207 386 7711

Deputy Safeguarding and Prevent

Daisy Gili

Email: daisy@londonfilmacademy.com

Tel: 02073867711

Local Safeguarding Children Partnership (LSCP)

Designated Manager for Child Protection in London Borough of Hammersmith and Fulham (LBHF): 0208 753 5124

Safer Organisations (incorporates LADO) and Safeguarding in Education Manager (Megan Brown)

Telephone: 020 8753 5125

Mobile: 0777 667 3020

Email: megan.brown@lbhf.gov.uk

Police

Metropolitan Police: 0300 123 1212 (24 hours)

The following telephone numbers may be useful for students:

Childline	0800 1111
NSPCC	0808 800 5000
Family Live	0808 800 2222

Prevent

Named contact for our FE/HE Regional Prevent Coordinator for London:

Jake Butterworth: Jake.BUTTERWORTH@education.gov.uk (or Tina Bencik,

Tina.bencik@lbhf.gov.uk, in his absence).

Unnamed Prevent contacts at LBHF are prevent@lbhf.gov.uk and 0208 753 5727.

External Resources

Big White Wall, Website: www.bigwhitewall.com

Tel: (0)203 405 6196 Email: theteam@bigwhitewall.com

Samaritans Tel: 116 123 Email: jo@samaritans.org



APPENDICES

APPENDIX 1: SIGNS AND TYPES OF ABUSE

Types of abuse can be physical, emotional, sexual, neglect, self-neglect, domestic, violence, psychological, financial, modern slavery, discriminatory, and institutional.

Possible signs of abuse, seen in anyone, include (but are not limited to):

- saying they has been abused or asks a question which gives rise to that inference
- there is no reasonable or consistent explanation for a person's injury; the injury is unusual in kind or location; there have been a number of injuries; there is a pattern to the injuries
- the person's behaviour stands out from the group as either being extreme model behaviour or extremely challenging behaviour; or there is a sudden change in their behaviour
- they ask to drop subjects with a particular individual and seems reluctant to discuss the reasons
- their development is delayed
- they lose or gain weight
- they appeared neglected, e.g. dirty, hungry, inadequately clothed
- they are reluctant to go home, or have been openly rejected by their parents, carers or co-habitants.

APPENDIX 2: SIGNS OF EXTREMISM AND RADICALISATION

Possible signs that may indicate a person is becoming an extremist or being radicalised:

- isolating themselves from family and friends
- talking as if from a scripted speech
- unwillingness or inability to discuss their views
- a sudden disrespectful attitude towards others
- increased levels of anger
- increased secretiveness, especially around internet use.

APPENDIX 3: TYPES OF EXTREMIST MATERIAL

Examples of extremist material could include:

- Articles, images, speeches or films promoting terrorism or racial or religious violence
- Videos of terror attacks
- Postings inciting people to commit acts of terrorism or violent extremism
- Messages intended to stir up hatred against any religious or ethnic group
- Bomb-making instructions
- Advice on how to obtain or make weapons
- Online graphic or violent extremist material or content that supports, directs or glorifies terrorism