

London Pathway College

Safeguarding Policy

Academic Year: 2025/2026

Key Contacts

Concerns and general guidance

student@lpc.port.ac.uk

LPC Designated Safeguarding Lead: **Dr Libby Pearson**

Lead Safeguarding Officer: **Thushanthi Sha**

Emergencies and out of business hours contacts

If there is an immediate risk of harm or other emergency, you should call 999 and speak to the emergency services. For non-emergency calls you can contact the Police on 101 or for medical concerns the NHS on 111.

Samaritans: 116123 – for support with many forms of emotional distress (For non-emergencies: jo@samaritans.org)

Papyrus: 0900 068 4141 or text 07860 039967 - Suicide Prevention advice:

Mind: 020 8519 2122 - info@mind.org.uk - Advice and support around mental health or text 'shout' to 85258 a free, confidential, anonymous text support service.

NSPCC Helpline: 0808 800 5000 – help@nspcc.org.uk advice for anyone who has concerns about the welfare of a child or young person

Anti-terrorist hotline: 0800 789 321 – for concerns about possible terrorist activity

Reporting online material promoting terrorism or extremism

Report illegal or harmful information, pictures or videos you've found on the internet. You can make your report anonymously.

<https://www.gov.uk/report-terrorism> Details of other External Support Organisations

1. Introduction

The London Pathway College (LPC) is committed to ensuring a safe and supportive environment for students, staff and visitors.

The primary purpose of the College is educating adults; however, the College recognises that there are students and staff who may be children or young adults (those aged under 18) or Adults at Risk. LPC believe that all have an equal right to protection from abuse, regardless of their age, race, religion, ability, gender, language, background or sexual identity and consider the welfare of the young person or vulnerable adult as paramount. Ultimate responsibility for children will continue to rest with parents and guardians.

The term 'safeguarding' describes the broader preventive and precautionary approach to planning and procedures that are necessary to be in place to protect children, young people and Adults at Risk from any potential harm. It is about ensuring that help and support is provided as soon as problems emerge, protecting them from harm, inside or outside the home, including online. Safeguarding is more than having background check policies and procedures in place. It means having a culture of vigilance where all staff know their responsibilities and act accordingly and all learners are aware of what they can expect and what to do if they have concerns. It is about providing a deep commitment to place the learner at the centre of our concerns and to build policies, practices and procedures around the learner for them to succeed.

This Policy sets out the College's approach to safeguarding children, adults at risk and establishes guidance and procedures in relation to activities or areas of perceived risk including how to report and deal with a cause for concern.

The College aims to provide a safe environment for children and adults with care or support needs.

There is no legislation in this area that is directed specifically at Higher Education Institutions. The main legislation is the [Children Act 1989](#), the [Safeguarding Vulnerable Groups Act 2006](#) as amended by the [Protection of Freedoms Act 2012](#).

This Policy is informed by a collection of legislation and guidance on the protection of children and adults at risk. This includes, but is not limited to: [Safeguarding against Sexual Exploitation and Abuse and Sexual Harassment \(SEAH\)](#), [The PREVENT Duty \(2023\)](#), [Counter-Terrorism and Border Security Act 2019](#).

For further reference legislation refer to Appendix B.

For the purposes of this Policy the definitions are as follows:

Students: any person registered to study with the London Pathway College.

Staff: any person employed by the College or acting under the auspices of the College, whether paid or voluntary.

Contractors: any person undertaking work for the College under the terms of a contract for services who is not employed by the College.

Children or Child: individuals who are aged under 18 years old.

Adults: are individuals over the age of 18 and at risk of abuse or neglect because of their care and/or support needs. The law no longer labels adults as vulnerable but defines the activities which might lead to an adult being considered vulnerable at that particular time. The focus is on the activities required by an Adult and not on the setting in which the activity is received.

Care and support needs: Where, because of mental or physical illness, disability, practical support, also known as social care services, is needed.

Safeguarding: actions taken to promote the wellbeing of children and adults with care and support needs and protect them from harm. Safeguarding is everyone's responsibility. Safeguarding applies if a child or an adult with care and support needs is experiencing or at risk of abuse and neglect.

2. Aims

The aims of this policy are as follows:

- i. to actively promote and safeguard the welfare of children and adults;
- ii. to have clear procedures in place for dealing with and referring concerns about a child or adult's welfare and allegations of abuse;
- iii. to have clear procedures in place to identify and appropriately support students and staff who might be at risk of radicalisation or exploitation;
- iv. to raise Staff and Student awareness about the College's safeguarding expectations;
- v. to ensure Staff are competent to carry out their safeguarding responsibilities and feel supported in this role;
- vi. to ensure consistent good safeguarding practice throughout the College;
- vi. to create a culture of safety, equality and protection.

3. Scope

The Policy, along with associated guidance and procedures, applies to all College activities involving children and adults. The policy applies to all college staff, students and contractors who may come into contact with children or adults as part of their work.

4. Roles and Responsibilities

The College will appoint a Safeguarding Lead who will have leadership responsibility for the College's safeguarding arrangements. The Safeguarding Lead is currently the College Pathway Director.

The College will appoint a Designated Safeguarding Lead. Currently the Safeguarding

Officer has responsibility for student safeguarding. The Safeguarding Officer will be responsible for:

- a) Implementing and promoting this Policy;
- b) Ensuring that the Policy is monitored and reviewed in accordance with changes in legislation and guidance on the protection of children and adults;
- c) Acting as the main contact within the College for safeguarding concerns;
- d) Ensuring that appropriate College Staff are provided with information, advice and training on the protection of children and adults in a vulnerable situation;
- e) Establishing and maintaining contacts with the external agencies including local Children's and Adult Social Care Services departments and Police;
- f) Referring concerns to the College Prevent Duty Single Point of Contact, where appropriate.
- g) Maintaining confidential records of relevant cases and action taken.

The Safeguarding Officers will take advice from the College Director on the legal aspects of the above responsibilities.

5. Procedure

The Safeguarding Procedure which sets out the processes by which students or staff may report causes for concern about the welfare of a child or adult can be found in Annex A.

In order to safeguard its students, the College recognises the need to work closely with external agencies (e.g. Social Services¹, Police², local Safeguarding Boards³, NHS⁴, and the Prevent Channel programme⁵).

6. Risk Assessment

Risk assessment procedures in relation to allegations of misconduct against students are set out in the Student Disciplinary Regulations. The Risk Assessment Panel (RAP) procedures are also used to consider allegations regarding staff and safeguarding concerns, including risk of radicalisation or exploitation.

All Staff that intend to, or may be put in the position of, working with children and adults should ensure that they understand the implications of this policy before commencing any programme, event, visit or other activity.

¹ [Adult social care | London Borough of Waltham Forest](#)

² [Waltham Forest | Metropolitan Police](#)

³ [Waltham Forest Safeguarding Children Board \(WFSCB\) | London Borough of Waltham Forest](#)

⁴ [Waltham Forest - NHS North East London \(icb.nhs.uk\)](#)

⁵ [Prevent | London Borough of Waltham Forest](#)

A designated member of Staff should complete a risk assessment before any new or changed programme, event, visit or any other activity involving children or adults, or before admitting or employing an under-18.

All those involved in the risk assessment process should understand that the risk assessment is not only a way to mitigate or remove any potential risks but may also be a prompt to consider alternative working practices.

7. Recruitment, selection and employment procedures

The College has clear guidelines on recruitment, selection and employment procedures.

The College will take all appropriate steps during the recruitment and selection process to ensure that unsuitable people are prevented from working with children and adults.

Where a risk assessment has identified that Students or Staff are likely to have regular contact with or encounter children and adults, appropriate checks into their eligibility will be required.

Such processes will be compliant with the College's Equality and Diversity policy.

The College is registered with the Disclosure and Barring Service⁶ (“DBS”) and will ensure that any staff or student who will have substantial one-to-one contact with children and adults and their role falls within the eligibility criteria will be checked for relevant criminal convictions.

8. Record keeping

It is the responsibility of the Designated Safeguarding Lead to maintain records of all concerns raised and actions taken.

All records created in accordance with this policy are managed in accordance with the College's policies that apply to the retention and destruction of records. Information about any allegations or suspicions of abuse must be shared on a need -to-know basis only.

Documentation related to allegations or suspicions must be stored in a secure place which is only accessible to those with appropriate knowledge of the suspicions or allegations. Details of completed risk assessments relating to activities involving children or adults must be retained by the relevant department whilst an activity or event is ongoing and for a minimum of five years after it has ceased (or the risk assessment has been superseded).

The College will undertake a regular review of this policy and the College's safeguarding procedures, including an update and review of the effectiveness of procedures and their implementation and the effectiveness of inter-agency working.

⁶ [Disclosure and Barring Service - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

9. Admission of Students

All applicants will be treated with equality and parity on academic and English language achievement grounds. Where the University Partner has specific risk assessment requirements surrounding students on a course under 18 years of age, these should be consulted, discussed in full and agreed with the University prior to any admission being granted. Deferred entry to a programme will be granted where appropriate.

All applicants under the age of 18 years at their time of enrolment are required to inform the College of all/any disabilities or intermittent/ongoing medical conditions at the time of admission.

Parents/legal guardians of all applicants under 18 are required to sign an offer acceptance form to acknowledge that they have read and understood the requirements of a mature learning environment and the responsibilities that they and their child/charge are entering into. They are also required to complete a consent form, indicating that they understand the UK Visas and Immigration (UKVI) requirements for travel and living arrangements for students under the age of 18. UKVI Student sponsor guidance states that students between the ages of 16 and 18 years who apply to study in the UK, must provide parental/guardian consent to travel and live independently in the UK.

Applicants and parents/legal guardians not resident in the UK, will be made aware that it is necessary for them to appoint a UK Guardian until the student turns 18 years of age. The College advises parents/legal guardians to approach the Association of Educational Guardians for International Students⁷ (AEGIS) for advice on the appointment of a Guardian or to assist more generally in the process of determining a suitable UK based Guardian. Whilst liability for the appointment of a UK Guardian remains that of the student's parent/legal guardian, the College Director reserves the right to not recognise an appointed UK Guardian if they deem them to not be suitable, and to require an alternative UK Guardian to be appointed. The individual will typically be expected to:

- Be over 25 years old
- Not be a current student at the College
- Be resident in the UK

UK Guardians should be aware of the importance of their role and should therefore be mature, and able to respond to any issues that may arise during the student's studies.

10. Procedures for the Recruitment of Students Under 18 Years of Age

All applicants under the age of 18 and their parent(s)/carer(s)/legal guardian(s) are provided with information relating to the expectations and responsibilities of all parties involved in their enrolment by the admission team. The Application Form will include the applicant's date of birth, and this is checked prior to any Offer of Admission being made. An Offer of Admission may be made to a student under 18 with the provision that the Offer cannot be confirmed or approved as fully accepted by the admission team until such time as the parent(s)/legal

⁷ [Contact Us | AEGIS \(aegisuk.net\)](https://aegisuk.net)

guardian(s) have completed the Offer Acceptance Form and given parental consent. In doing so they indicate that they agree to all statements and therein conditions of the status of their child until they turn 18 years of age.

The College reserves the right to refuse to admit a vulnerable person to a programme of study, if it judges that the adaptations necessary to safeguard that individual's wellbeing go beyond what is reasonable and proportionate.

Where adaptations are reasonable and proportionate, the College will put in place several support structures that safeguard the wellbeing of vulnerable groups.

There may be a condition of admission to certain programmes of study (where a student will come into close contact with children or vulnerable groups. In this instance the student will be required to undergo an enhanced DBS disclosure prior to the commencement of the programme. The College is obliged to refuse admission if the DBS disclosure, on a reasonable assessment, would disqualify the applicant from entering the programme.

Except in relation to specific programmes the College has limited powers to ask about unspent criminal convictions on admission. Where, during the admissions process, a conviction is disclosed indicating that an individual poses a clear risk to vulnerable groups, the College has the right to deny admission as a student.

The College does not consider it practicable to take steps other than those described in this section, to vet the backgrounds of students who, during learning and teaching activities and administrative activities, come into contact with other students who are vulnerable. The College takes a risk management approach to organising and adapting the delivery of curriculum and services through the application of risk assessments.

11. Accommodation and Contracts

The College will aim to help support all new students to source accommodation if requested.

However, it is ultimately the responsibility of each student (including students under 18, their parent or guardian) to assess whether the accommodation on offer is suitable for their needs and whether the terms of occupancy are reasonable.

Any person under the age of 18 is unable to enter a legal contract. If a student under 18 needs to enter a contract with, for example, an accommodation provider, a parent or guardian is required to guarantee the student's obligation under that contract including the payment of rent or other associated fees. A failure to pay any sums due under a contract may result in demand being made by the contractor on the parent or guardian. Any continuing failure to pay may result in studies being interrupted.

Under 18-year-olds are actively encouraged to participate in clubs and societies organised by the College and/or the University's Student Union (where the University allows). However, an under 18 is unable to hold Office until they reach the age of 18, as they will be unable to discharge an office-holder's legal responsibilities.

12. Policy Review

LPC will review this policy annually as a minimum in-line with any regulatory requirements.

Annex A - Safeguarding Procedure Managing a Safeguarding Concern

The primary purpose of the College is educating adults. However, the College has a responsibility to pass on concerns about under 18s and adults who are unable to protect themselves from harm or exploitation and to safeguard individuals from being drawn into terrorism. All staff should understand the signs and know how to pass on concerns for more advice. The College has a Safeguarding Oversight Board.

What should I be looking for?

A student may tell you about difficulties their parents or carers are experiencing, for example with mental health, drug or alcohol use, domestic abuse that is happening in the home. There may be children, disabled adults or others who may be at risk and who may be vulnerable and unable to advocate for themselves.

A student, their friend or family member may have been the victim of a crime, be in an exploitative or abusive relationship.

A student, their friend or family member may be under the influence of others who are trying to radicalise them. They may be becoming isolated and withdrawn from their usual community; accessing extremist material online; or sharing extreme and violent views.

How can I help?

It is important that you act quickly but appropriately and do not keep safeguarding concerns to yourself. There are people in the College who are used to dealing with safeguarding concerns and can help you.

It is also important to listen carefully and take notes of what you have been told.

If the student has been the victim of a crime or are the subject of the safeguarding concern, are they able to keep themselves safe?

You cannot promise to keep the issue confidential, and you need to explain that you may need to share your concerns with others, particularly if others are at risk.

If you believe that there is an imminent risk of danger to others you should escalate as quickly as possible and may need to telephone the police.

What happens next?

The College will contact you for more details and then speak to the relevant Designated Safeguarding Lead at the College.

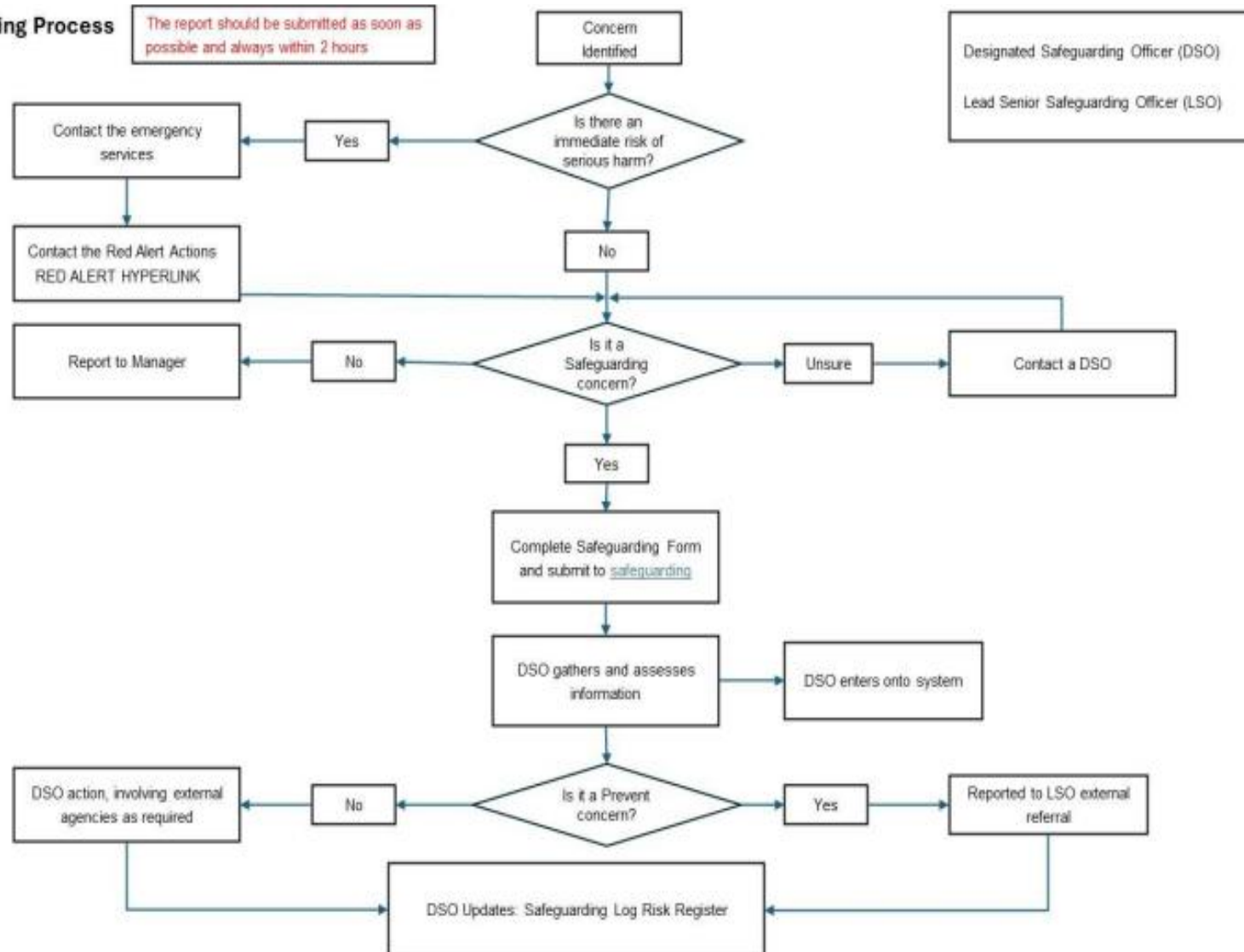
If there is an immediate risk, they may call the Police on 999. Concerns may also be reported to external organisations such as the Local Authority Designated Officer for Safeguarding or the local Prevent team.

The College has a risk assessment process which includes referral to the Risk Assessment Panel (RAP). Your concern may be referred to the RAP for a decision regarding next steps.

Regular reports are made to the Safeguarding Oversight Board, chaired by the Safeguarding Lead.

Safeguarding Process

The report should be submitted as soon as possible and always within 2 hours



Appendix 2

Legal Context

This Policy and related LPC procedures are informed by a collection of legislation and guidance on the protection of children and adults at risk.

This includes, but is not limited to:

- [Children Act 1989](#)
- [Children Act 2004](#)
- [Keeping Children Safe in Education 2023](#)
- [Working together to Safeguard Children 2018](#)
- [Safeguarding Policy: Protecting Vulnerable Adults](#)
- [Safeguarding Vulnerable Groups Act 2006](#)
- [Sexual Offences Act 2003](#)
- [Equality Act 2010](#)
- [Protection of Freedoms Act 2012](#)
- [Safeguarding against Sexual Exploitation and Abuse and Sexual Harassment \(SEAH\) Due Diligence Guidance for FCDO implementing partners 2022 \(formerly the Enhanced Due Diligence: Safeguarding for External Partners\)](#)
- [Child Safeguarding Due Diligence: for external partners 2020](#)
- [Counter-Terrorism and Border Security Act 2019](#)
- [The Prevent Duty \(2023\)](#)
- [General Data Protection Regulation](#)
- [Health and Safety at Work Act 1974](#)