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**London Met Students' Union**

## **Safeguarding Policy & Procedure**



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## 1. Purpose

This policy sets out LMSU's approach to safeguarding the wellbeing of children, young people and adults at risk and outlines the procedure that is followed when there is a safeguarding concern.

The purpose of this policy and procedure is to:

1. Outline LMSU's responsibilities for safeguarding the wellbeing of children, young people and adults at risk who participate in or benefit from any of its services or activities and/or who are on its premises
2. Set out the expectations, duties, and requirements of LMSU staff and volunteers

## 2. Introduction and principles

LMSU recognises that it has social, moral, and legal obligations to safeguard the wellbeing of children, young people and adults at risk involved in any LMSU activities, whether they are conducted in person or online. These measures are in addition to those required under Health and Safety legislation.

The general principles behind this policy are:

1. Whenever the interests of a child, young person or adult at risk are involved, their welfare must always be paramount
2. LMSU is committed to ensuring that there are adequate procedures in place to safeguard the wellbeing of any individuals participating in or benefiting from its services and activities and that there are adequate procedures in place to address any concerns



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## 3. Definitions

Safeguarding is defined as protecting people's health, wellbeing and human rights, and enabling them to live free from harm, exploitation, victimisation, abuse, neglect, sexual misconduct and violence.

A 'Child' or 'Young person' includes any person up to the age of 18

An 'Adult at risk' includes any person aged 18 years and over who:

- has needs for care and support (whether or not the authority is meeting any of those needs),
- is experiencing, or is at risk of, abuse or neglect, and
- as a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it

## 4. Scope

This policy applies to all activities of LMSU and its subsidiaries, either involving or which may involve working with children, young people and adults at risk. This includes:

- Children, young people and adults at risk who participate in or engage with any LMSU services, activities or events
- Any member of LMSU staff or volunteers who may come into contact with children, young people or adults at risk as part of their role
- LMSU staff or volunteers who may be under 18 or an adult at risk

LMSU may work with other organisations to deliver activities either on LMSU premises, online or at the premises of the other organisation. LMSU will ensure that appropriate safeguarding arrangements are in place for these activities and agree which organisation will take lead safeguarding responsibility.

Where external organisations working with children, young people and adults at risk are afforded access to LMSU's premises and/or facilities, LMSU will ensure that appropriate evidence is obtained relating to the fulfilment by the external organisation



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of its safeguarding responsibilities.



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## 5. Preventative measures

LMSU takes a number of preventative actions in order to safeguard the wellbeing of children, young people and adults at risk. These include:

### **Recruitment, selection and ongoing supervision of staff and volunteers:**

Procedures are in place for the recruitment, selection and ongoing supervision of staff and volunteers that comply with employment law, equality and diversity policies and selection guidance. Safeguarding training should be delivered as appropriate, and DBS checks will be required for those who have substantial contact with children, young people and adults at risk. DBS checks will not automatically be required for staff or volunteers coming into contact with children, young people or adults at risk in the course of normal Union activity

**Staff and volunteer behaviour and conduct:** All staff and volunteers are required to follow a code of conduct (see [Appendix 1](#)) that provides guidelines for appropriate behaviour when working with children, young people and adults at risk. Staff and volunteers must also act in accordance with all other LMSU policies and procedures aimed at ensuring the health, safety and wellbeing of staff, volunteers, students and anyone else participating in or benefitting from any of its services or activities and/or who are on its premises. LMSU's policies and procedures can be found in the Employee Handbook, Volunteer Handbook and on its webpages.

**Services, activities and events:** Consideration is given to how to safeguard the wellbeing of children, young people and adults at risk who participate or benefit from any of LMSU's services, activities or events and/or who are on its premises. Risk assessments are undertaken prior to any project, activity or event that may involve children, young people or adults at risk

**Training and support:** For some roles at LMSU safeguarding training is mandatory and must be completed before undertaking work in a position of trust. Staff and volunteers will be notified if this applies to their role. It is recommended that other staff complete the University's 'Safeguarding Essentials' online training course. All staff and volunteers are provided with information about LMSU's Safeguarding Policy and procedure, including how to report any concerns, as part of their induction.



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Safeguarding is also discussed regularly as part of 1-to-1s and team meetings. Support for staff or volunteers dealing with, or affected by safeguarding issues, is generally offered through the Line Manager or Volunteer Coordinator. Students (including student staff) can access specialist support from the expert teams within the University. Non-student staff can seek support from the Employee Assistance Programme.

**Proactive Policies and Procedures:** LMSU has a number of policies and procedures which are of relevance to the implementation of the Safeguarding Policy and procedure. These include: Health and Safety policies; Equality and Diversity policies; policies covering appropriate use of IT and Social Media; and policies and procedures for managing complaints, grievances and disciplinary matters.

## 6. Recognising safeguarding concerns

Harm and abuse can take different forms and includes physical abuse, sexual abuse, emotional abuse and neglect. It may be a single act or repeated behaviour and may be intentional or unintentional. Abuse may also be defined as an act of neglect or a failure to act on the part of someone who has caring responsibilities

You may become aware of a concern through your own observations, something that someone else tells you about a child, young person or adult at risk or something a child, young person or adult at risk themselves tells you. Staff and volunteers should know the signs and symptoms of harm and abuse. Signs and symptoms are not always obvious or clear. However, the more that staff and volunteers know about possible indicators, the more likely they are to recognise harm and abuse and take action.

For information about types of abuse and possible indicators see [Appendix 2](#).



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## 7. Responding to someone who raises a safeguarding concern

If someone tells you directly that they have experienced harm or abuse you should:

1. Remain calm
2. Offer reassurance that they have done the right thing in telling you
3. Let the person talk and listen carefully without questioning the truth of what the person is saying
4. Respond sensitively without expressing an opinion or imposing your own views and values
5. Try to obtain all the information needed to understand the situation without making any assumptions or judgements about what has happened or starting to investigate
6. Ask open questions that encourage the person to speak
7. If they are under 18, explain that you have a responsibility to tell someone else about what you have been told because you want to keep them safe
8. If they are an adult at risk, it is good practice to gain the person's consent to share your concern. Never promise to keep something secret however, there will be times when confidentiality must be breached in line with safeguarding procedures - see [Section 8](#) for more information about confidentiality
9. Explain to them what will happen next

### Do not:

1. Interrupt or stop them from speaking freely
2. React strongly, for instance saying, "That's awful" or "How could someone do that?"
3. Jump to conclusions about what happened or who is to blame
4. Ask direct and/or invasive questions. These may prevent the person from telling the full story and may also trigger trauma symptoms
5. Promise confidentiality - there will be times when confidentiality must be breached - see [Section 8](#).





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## 8. Recording and reporting safeguarding concerns

Anyone who has a safeguarding concern has a responsibility to report it. This includes staff members, volunteers, students participating in or benefitting from any LMSU services, activities or events, external organisations delivering activities either on LMSU premises or online and any visitors. LMSU commits to taking all safeguarding concerns seriously, and to taking action where appropriate and in line with current LMSU policy.

### Emergency situations

**Where you are concerned that there is an imminent risk of danger or harm, contact the emergency services by calling 999 and/or University security teams on 3333.**

This action must then be followed up urgently with a safeguarding report to a Local Safeguarding Officer (see [Appendix 3](#)) or via the 'Report a concern' form located on the University's Safeguarding webpages at <https://www.londonmet.ac.uk/about/policies/safeguarding/>

If such an incident is reported by students, the report should be made by the staff member or volunteer made aware of the incident and it is their responsibility to ensure that a safeguarding report is submitted.

### All other safeguarding concerns

Reports should be submitted as soon as possible. You can submit a safeguarding report by either:

1. Completing a Safeguarding Concern Reporting Form, providing as much detail as possible, via the 'Report a concern' form located on the University's webpages at



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<https://www.londonmet.ac.uk/about/policies/safeguarding/>

2. Reporting the concern to a Local Safeguarding Officer, providing as much information as possible, who will then report the concern using the Safeguarding Concern Reporting Form

You should not:

- Discuss the concern with anyone other than the Local Safeguarding Officer
- Investigate any allegations
- Under no circumstances should you contact or confront the alleged abuser, even if they are known to you or are a LMSU staff member or volunteer

Having considered the concern and all information available, the Local Safeguarding Officer will determine what further steps to take, which may include:

- Referring the person concerned to relevant support services, such as to the Advice Service, the Counselling Service or the Disabilities and Dyslexia Service (DDS);
- Referring the matter to be considered under other LMSU procedures such as the staff disciplinary procedure, volunteer or members relevant code of conduct or the complaints procedure
- Reporting the matter to an external body, such as the police or the local authority

The Local Safeguarding Officer may also need to establish additional information before a decision on the next steps is made.

A flowchart showing the procedure for reporting safeguarding concerns can be found at [Appendix 4](#).

### **Record keeping**

LMSU will keep records of safeguarding concerns or allegations including details of decisions reached and how those decisions were arrived at. These records will be kept securely for 6 years and will only be shared with the appropriate staff.

### **Confidentiality**



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The need to break confidentiality is rare but there will be times when confidentiality must be breached in order to safeguard the wellbeing of a child, young person or adult at risk. LMSU is subject to statutory requirements to disclose information to external agencies in specific circumstances. This may happen without the consent of the individual reporting a cause for concern

LMSU treats all data in line with the obligations outlined in our Data Protection Policy and identifying personal information should not normally be given directly or indirectly to any organisation or individual external to LMSU without a persons expressed consent to disclose such information. LMSU recognises however that occasions may arise where there is a need to breach confidentiality. An example of such an occasion would be if we felt there was a serious risk of harm or abuse to a child, young person or adult at risk.

Staff and volunteers should respect peoples' rights to privacy but never promise to keep something secret - there will be times when confidentiality must be breached in line with this procedure.

LMSU will always seek to gain the person's consent before sharing any information in relation to a safeguarding concern however information may be shared without consent if LMSU believes there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child, young person or adult at risk in a timely manner.

Staff and volunteers should inform the person making the disclosure that the information will be passed on to the relevant Lead Safeguarding Officer, who may then have to pass this to the police or Social Services.

Where LMSU decides to share information without consent there will be a record kept of the discussion and decision-making process to share that information.

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## Appendix 1: Staff and volunteer code of conduct

Some actions, no matter how well intentioned, may be misinterpreted and leave all parties at risk. The following is a reference guide to appropriate behaviour when working with children, young people and adults at risk.

You should:

1. Be alert to any potential harm or inappropriate behaviour
2. Always contact a Local Safeguarding Officer with any concerns about an individual's safety or wellbeing
3. Act as an appropriate role model and provide an example you wish others to follow
4. Challenge unacceptable behaviour by others including abusive activities, bullying, harassment or sexual misconduct, including online behaviours
5. Avoid use of language, terminology or behaviour which could be interpreted as having a sexual connotation or innuendo
6. Challenge the use of inappropriate or offensive language
7. Undertake a risk assessment prior to any project, activity or event involving children, young people or adults at risk
8. Consider the age of students or others when discussing sensitive issues, particularly if they are under 18
9. Avoid being alone for substantial periods of time with children, young people and adults at risk. Where one-to-one work is necessary, inform another staff member where you will be, with whom and for how long
10. Ensure that all contact with any individuals participating in or benefiting from LMSU's services and activities is conducted in an appropriate setting and only use official LMSU or individual work email or social media channels - never use personal accounts
11. Be aware that physical contact with a child, young person or adult at risk, however well-intentioned, may be misinterpreted. If touching is in a sporting situation it should be in accordance with the guidelines provided by the appropriate National Governing Body



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12. Carefully plan and consider sleeping arrangements before any residential activities. Whilst it is recommended that separate accommodation be provided for different genders, consideration must also be given to ensuring that an inclusive environment is provided for all and that the needs and preferences of any transgender and non-binary participants are met
13. Adhere to the safeguarding policies and procedures of any external organisations with which you are working

You should not:

- Engage in a relationship or any sexual activity with someone with whom you are in a position of trust. Whilst a young person can consent to sexual activity once they reach the age of 16, the Sexual Offences Act (2003) makes it a criminal offence for a person to engage in sexual activity of any kind with a person under the age of 18, where the adult is in a position of trust
- Engage in private social media correspondence with a student or others who you may come into contact with whilst undertaking your role
- Do something for a child or adult at risk if they have the ability and capacity to do it for themselves. Tasks should only be done for someone with their consent and their full understanding
- Show favouritism to, or become too closely associated with, any individuals participating in or benefiting from the LMSU's services and activities



## Appendix 2: Types of abuse and possible indicators

Abuse can be defined as cruel and/or violent treatment that causes harm and distress.

Harm and abuse can take different forms and includes physical abuse, sexual abuse, emotional abuse and neglect. It may be a single act or repeated behaviour and it may also be intentional or unintentional. It can occur in someone's home, a care home, hospital or a public place. Abuse may also be peer on peer, carried out by children, young people and adults at risk.

Abuse may also be defined as an act of neglect or a failure to act on the part of someone who has caring responsibilities.

Patterns of abuse vary and include:

- Serial abuse in which the perpetrator seeks out and 'grooms' individuals
- Long-term abuse in the context of an ongoing family relationship such as domestic violence between spouses or generations or persistent psychological abuse
- Opportunistic abuse such as theft where money or jewellery has been left out

### Types of abuse and possible indicators

The information below aims to help people who come into contact with children, young people and adults at risk to identify abuse and recognise potential indicators

| Child abuse   |                     |
|---------------|---------------------|
| Type of abuse | Possible indicators |
|               |                     |



### Physical abuse

A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child

There may be physical indicators that a child or young person is being physically abused. Some examples of this are:

- Unexplained bruises, welts, cuts, abrasions
- Unexplained burns
- Unexplained fractures or disclosures

There may also be behavioural indicators that a child or young person is being physically abused. Some examples of this are:

- Is wary of adults or of a particular individual
- Is violent to animals or other children or





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|  | <p>young people</p> <ul style="list-style-type: none"><li>• Is dressed inappropriately to hide bruises or other injuries</li><li>• May be extremely aggressive or extremely withdrawn</li><li>• Cannot recall how the injuries occurred or gives inconsistent explanations</li></ul> |
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### **Sexual abuse**

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing.

They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children

There may be physical indicators that a child or young person is being sexually abused. Some examples of this are:

- Torn, stained or bloody underclothing
- Bruises, lacerations, redness, swelling or bleeding in genital, vaginal or anal area
- Blood in urine or faeces
- Sexually transmitted disease
- Unusual or excessive itching or pain in the genital or anal area

There may also be



behavioural indicators that a child or young person is being sexually abused. Some examples of this are:

- Age-inappropriate sexual play with toys, self, others
- Bizarre, sophisticated or unusual sexual knowledge
- Comments such as “I’ve got a secret”, or “I don’t like uncle”
- Fire lighting by boys
- Fear of certain places e.g. bedroom or bathroom

Some examples of this in older children or young people are:



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|  | <ul style="list-style-type: none"><li>• Eating disorders</li><li>• Promiscuity or prostitution</li><li>• Uses younger children in sexual acts</li><li>• Tries to make self as unattractive as possible</li></ul> |
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### Emotional abuse

The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person.

It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.

It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction.

It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone

There may be physical indicators that a child is being emotionally abused. Some examples of this are:

- Bed-wetting or bed soiling that has no medical cause
- Frequent psychosomatic complaints (e.g. headaches, nausea, abdominal pains)
- Prolonged vomiting or diarrhoea
- Has not attained significant developmental milestones
- Dressed differently from other children in



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|  | <p>the family</p> <ul style="list-style-type: none"><li>• Has deprived physical living conditions compared with other children in the family</li></ul> <p>There may also be behavioural indicators that a child or young person is being emotionally abused. Some examples of this are:</p> <ul style="list-style-type: none"><li>• Suffers from severe developmental gaps</li><li>• Severe symptoms of depression, anxiety, withdrawal or aggression</li><li>• Severe symptoms of</li></ul> |
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|  | <p>self-destructive<br/>behaviour –<br/>self-harming,<br/>suicide attempts,<br/>engaging in<br/>drug or<br/>alcohol<br/>abuse</p> <ul style="list-style-type: none"><li>• Overly<br/>compliant;<br/>too<br/>well-mannered;<br/>too<br/>neat and<br/>clean</li><li>• Displays<br/>attention<br/>seeking<br/>behaviours<br/>or displays<br/>extreme<br/>inhibition in<br/>play</li><li>• When at<br/>play,<br/>behaviour<br/>may model<br/>or copy<br/>negative<br/>behaviour<br/>and<br/>language<br/>used at</li></ul> |
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### Neglect

The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development.

Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- protect a child from physical and emotional harm or danger;
- ensure adequate supervision (including the use of inadequate caregivers); or
- ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs

There may be physical indicators that a child or young person is being neglected. Some examples of this are:

- Inappropriate dress for the weather
- Extremely dirty or unbathed
- Inadequately supervised or left alone for unacceptable periods of time
- Malnourished
- May have severe nappy rash or other persistent skin disorders or rashes resulting from improper care or lack



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|  | <p>of hygiene</p> <p>There may also be behavioural indicators that a child or young person is being neglected. Some examples of this are:</p> <ul style="list-style-type: none"><li>• Demonstrates severe lack of attachment to other adults</li><li>• Poor school attendance or school performance</li><li>• Poor social skills</li><li>• May steal food</li><li>• Is very demanding of affection or attention</li><li>• Has no understanding of basic hygiene</li></ul> |
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| Adult abuse   |  |
|---|--|
| Type of abuse   | Possible indicators  |
| <p><b>Physical abuse</b></p> <p>Physical ill treatment that could include:</p> <ul style="list-style-type: none"> <li>• Assault, hitting, slapping, punching, kicking, hair-pulling, biting, pushing</li> <li>• Rough handling</li> <li>• Scalding and burning</li> <li>• Physical punishments</li> <li>• Inappropriate or unlawful use of restraint</li> <li>• Making someone purposefully uncomfortable (e.g. opening a window and removing blankets)</li> <li>• Involuntary isolation or confinement</li> <li>• Misuse of medication (e.g. over-sedation)</li> <li>• Forcible feeding or withholding food</li> <li>• Unauthorised restraint, restricting movement (e.g. tying someone to a chair)</li> </ul> | <p>Possible indicators include:</p> <ul style="list-style-type: none"> <li>• No explanation for injuries or inconsistency with the account of what happened</li> <li>• Injuries are inconsistent with the person's lifestyle</li> <li>• Bruising, cuts, welts, burns and/or marks on the body or loss of hair in clumps</li> <li>• Frequent injuries</li> <li>• Unexplained falls</li> <li>• Subdued or changed behaviour in the presence of a particular</li> </ul> |

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|  | <p>person</p> <ul style="list-style-type: none"> <li>• Signs of malnutrition</li> <li>• Failure to seek medical treatment or frequent changes of GP</li> </ul>  |
| <p><b>Domestic abuse</b></p> <p>Domestic abuse, or domestic violence, can be defined as any incident of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been intimate partners or family members, regardless of their gender or sexuality. The abuse can encompass, but is not limited to</p> <ul style="list-style-type: none"> <li>• Psychological</li> <li>• Physical</li> <li>• Sexual</li> <li>• Financial</li> <li>• Emotional</li> </ul> <p>It also includes 'honour' based violence, female genital mutilation (FGM) and forced marriage. Victims are not confined to one gender or ethnic group.</p> <p>Family members include mother, father, son, daughter, brother, sister, and grandparents, whether directly related, in laws or stepfamily.</p> <p><b>Coercive behaviour</b> is an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim. This definition includes so-called 'honour' based violence, female genital mutilation (FGM) and forced</p> | <p>Possible indicators include:</p> <ul style="list-style-type: none"> <li>• Low self-esteem</li> <li>• Feeling that the abuse is their fault when it is not</li> <li>• Physical evidence of violence such as bruising, cuts, broken bones</li> <li>• Verbal abuse and humiliation in front of others</li> <li>• Fear of outside intervention</li> <li>• Damage to home or property</li> <li>• Isolation – not seeing friends and family</li> </ul> |



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marriage

**Controlling behaviour** is a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour

- Limited access to money

**Sexual abuse**

Sexual abuse is unwanted sexual activity or sexual behaviour that happens without consent or understanding. It includes:

- Rape, attempted rape or sexual assault
- Inappropriate touch anywhere
- Non- consensual masturbation of either or both persons
- Non- consensual sexual penetration or attempted penetration of the vagina, anus or mouth
- Any sexual activity that the person lacks the capacity to consent to
- Inappropriate looking, sexual teasing or innuendo or sexual harassment
- Sexual photography or forced use of pornography or witnessing of sexual acts
- Indecent exposure

Possible indicators include:

- Bruising, particularly to the thighs, buttocks and upper arms and marks on the neck
- Torn, stained or bloody underclothing
- Bleeding, pain or itching in the genital area
- Unusual difficulty in walking or sitting
- Foreign bodies in genital or rectal openings
- Infections, unexplained genital discharge, or sexually transmitted diseases
- Pregnancy in a woman who is unable to consent to



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|  | <p>sexual intercourse</p> <ul style="list-style-type: none"><li>• The uncharacteristic use of explicit sexual language or significant changes in sexual behaviour or attitude</li><li>• Incontinence not related to any medical diagnosis</li><li>• Self-harming</li><li>• Poor concentration, withdrawal, sleep disturbance</li><li>• Excessive fear/apprehension of, or withdrawal from, relationships</li><li>• Fear of receiving help with personal care</li><li>• Reluctance to be alone with a particular</li></ul> |
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|  | person   |
| <p><b>Psychological abuse</b></p> <p>Psychological abuse is behaviour that has a harmful effect on the person's emotional health and development. It includes:</p> <ul style="list-style-type: none"> <li>• Enforced social isolation – preventing someone accessing services, educational and social opportunities and seeing friends</li> <li>• Removing mobility or communication aids or intentionally leaving someone unattended when they need assistance</li> <li>• Preventing someone from meeting their religious and cultural needs</li> <li>• Preventing the expression of choice and opinion</li> <li>• Failure to respect privacy</li> <li>• Preventing stimulation, meaningful occupation or activities</li> <li>• Intimidation, coercion, harassment, use of threats, humiliation, bullying, swearing or verbal abuse</li> <li>• Addressing a person in a patronising or infantilising way</li> <li>• Threats of harm or abandonment</li> <li>• Cyber bullying</li> </ul> | <p>Possible indicators include:</p> <ul style="list-style-type: none"> <li>• An air of silence when a particular person is present</li> <li>• Withdrawal or change in the psychological state of the person</li> <li>• Insomnia</li> <li>• Low self-esteem</li> <li>• Uncooperative and aggressive behaviour</li> <li>• A change of appetite, weight loss/gain</li> <li>• Signs of distress: tearfulness, anger</li> <li>• Apparent false claims, by someone involved with the person, to attract</li> </ul> |





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|  | unnecessary<br>treatment |
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### Financial or material abuse

Financial abuse is when someone tries to steal or steals or defrauds someone of their money, goods or property.

It includes:

- Theft of money or possessions
- Fraud, scamming
- Preventing a person from accessing their own money, benefits or assets
- Employees taking a loan from a person using the service
- Undue pressure, duress, threat or undue influence put on the person in connection with loans, wills, property, inheritance or financial transactions
- Arranging less care than is needed to save money to maximise inheritance
- Denying assistance to manage/monitor financial affairs
- Denying assistance to access benefits
- Misuse of personal allowance in a care home
- Misuse of benefits or direct payments in a family home
- Someone moving into a person's home and living rent free without agreement or under duress
- False representation, using another person's bank account, cards or documents
- Exploitation of a person's money or assets, e.g. unauthorised use of a car
- Misuse of a power of attorney, deputy, appointeeship or other legal authority
- Rogue trading – e.g. unnecessary or overpriced property repairs and failure to carry out agreed repairs or poor workmanship

Possible indicators include:

- Missing personal possessions
- Unexplained lack of money or inability to maintain lifestyle
- Unexplained withdrawal of funds from accounts
- Power of attorney or lasting power of attorney (LPA) being obtained after the person has ceased to have mental capacity
- Failure to register an LPA after the person has ceased to have mental capacity to manage their finances, so that it appears that they are



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|  | <p>continuing to do so</p> <ul style="list-style-type: none"><li>• The person allocated to manage financial affairs is evasive or uncooperative</li><li>• The family or others show unusual interest in the assets of the person</li><li>• Signs of financial hardship in cases where the person's financial affairs are being managed by a court appointed deputy, attorney or LPA</li><li>• Recent changes in deeds or title to property</li><li>• Rent arrears and eviction</li></ul> |
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|  | <p>notices</p> <ul style="list-style-type: none"><li>• A lack of clear financial accounts held by a care home or service</li><li>• Failure to provide receipts for shopping or other financial transactions carried out on behalf of the person</li><li>• Disparity between the person's living conditions and their financial resources, e.g. insufficient food in the house</li><li>• Unnecessary property repairs</li></ul> |
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| <p><b>Modern slavery</b></p> <p>Modern slavery or human trafficking is the movement of a person from one place to another (this could be country to country, town to town, or even as simple as one room in a building to another) into conditions of exploitation, using deception, coercion, abuse of power or the abuse of the person’s vulnerability. Even if a victim consents and is willing to be moved, trafficking could still be taking place. It involves either the threat of harm or actual harm to the person themselves or their family. It includes:</p> <ul style="list-style-type: none"> <li>• Human trafficking</li> <li>• Forced labour</li> <li>• Domestic servitude</li> <li>• Sexual exploitation, such as escort work, prostitution and pornography</li> <li>• Debt bondage – being forced to work to pay off debts that realistically they never will be able to</li> </ul> | <p>Possible indicators include:</p> <ul style="list-style-type: none"> <li>• Signs of physical or emotional abuse</li> <li>• Appearing to be malnourished, unkempt or withdrawn</li> <li>• Isolation from the community, seeming under the control or influence of others</li> <li>• Living in dirty, cramped or overcrowded accommodation and or living and working at the same address</li> <li>• Lack of personal effects or identification documents</li> <li>• Always wearing the same clothes</li> <li>• Avoidance of</li> </ul> |
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|   | <p>eye contact, appearing frightened or hesitant to talk to strangers</p> <ul style="list-style-type: none"> <li>• Fear of law enforcers</li> </ul>   |
| <p><b>Discriminatory abuse</b></p> <p>Discriminatory abuse is abuse that focuses on a difference or perceived difference. This may involve race, gender, disability, or any of the protected characteristics of the Equality Act. Examples of discriminatory abuse might involve harassment, slurs, or similar treatment based on the difference or perceived difference. It includes:</p> <ul style="list-style-type: none"> <li>• Unequal treatment based on age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex or sexual orientation (known as 'protected characteristics' under the Equality Act 2010)</li> <li>• Verbal abuse, derogatory remarks or inappropriate use of language related to a protected characteristic</li> <li>• Denying access to communication aids, not allowing access to an interpreter, signer or lip-reader</li> <li>• Harassment or deliberate exclusion on the grounds of a protected characteristic</li> <li>• Denying basic rights to healthcare, education, employment and criminal justice relating to a protected characteristic</li> <li>• Substandard service provision relating to a</li> </ul> | <p>Possible indicators include:</p> <ul style="list-style-type: none"> <li>• The person appears withdrawn and isolated</li> <li>• Expressions of anger, frustration, fear or anxiety</li> <li>• The support on offer does not take account of the person's individual needs in terms of a protected characteristic</li> </ul> |

| protected characteristic   |   |
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| <p><b>Organisational abuse</b></p> <p>Organisational or institutional abuse is the mistreatment or neglect of an adult at risk by a regime or individuals. It takes place within settings and services that adults at risk live in or use such as hospitals or care homes and may range from one off incidents to on-going ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation. It includes:</p> <ul style="list-style-type: none"> <li>● Discouraging visits or the involvement of relatives or friends</li> <li>● Run-down or overcrowded establishment</li> <li>● Authoritarian management or rigid regimes</li> <li>● Lack of leadership and supervision</li> <li>● Insufficient staff or high turnover resulting in poor quality care</li> <li>● Abusive and disrespectful attitudes towards people using the service</li> <li>● Inappropriate use of restraints</li> <li>● Lack of respect for dignity and privacy</li> <li>● Failure to manage residents with abusive behaviour</li> <li>● Not providing adequate food and drink, or assistance with eating</li> <li>● Not offering choice or promoting independence</li> <li>● Misuse of medication</li> <li>● Failure to provide care with dentures, spectacles or hearing aids</li> <li>● Not taking account of individuals' cultural, religious or ethnic needs</li> <li>● Failure to respond to abuse appropriately</li> <li>● Interference with personal correspondence or</li> </ul> | <p>Possible indicators include:</p> <ul style="list-style-type: none"> <li>● Lack of flexibility and choice for people using the service</li> <li>● Inadequate staffing levels</li> <li>● People being hungry or dehydrated</li> <li>● Poor standards of care</li> <li>● Lack of personal clothing and possessions and communal use of personal items</li> <li>● Lack of adequate procedures</li> <li>● Poor record-keeping and missing documents</li> <li>● Absence of visitors</li> <li>● Few social, recreational</li> </ul> |



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| <p>communication</p> <ul style="list-style-type: none"><li>• Failure to respond to complaints</li></ul> | <p>and educational activities</p> <ul style="list-style-type: none"><li>• Public discussion of personal matters</li><li>• Unnecessary exposure during bathing or using the toilet</li><li>• Absence of individual care plans</li><li>• Lack of management overview and support</li></ul> |
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| <p><b>Neglect and acts of omission</b></p> <p>Neglect and acts of omission occur when a person deliberately withholds, or fails to provide, suitable and adequate care and support needed by another adult. It may be through a lack of knowledge or awareness, or through a decision not to act when they know the adult in their care needs help. It may impair the health or well-being of an adult. It includes:</p> <ul style="list-style-type: none"> <li>● Failure to provide or allow access to food, shelter, clothing, heating, stimulation and activity, personal or medical care</li> <li>● Providing care in a way that the person dislikes</li> <li>● Failure to administer medication as prescribed</li> <li>● Refusal of access to visitors</li> <li>● Not taking account of individuals' cultural, religious or ethnic needs</li> <li>● Not taking account of educational, social and recreational needs</li> <li>● Ignoring or isolating the person</li> <li>● Preventing the person from making their own decisions</li> <li>● Preventing access to glasses, hearing aids, dentures, etc.</li> <li>● Failure to ensure privacy and dignity</li> </ul> | <p>Possible indicators include:</p> <ul style="list-style-type: none"> <li>● Poor environment – dirty or unhygienic</li> <li>● Poor physical condition and/or personal hygiene</li> <li>● Pressure sores or ulcers</li> <li>● Malnutrition or unexplained weight loss</li> <li>● Untreated injuries and medical problems</li> <li>● Inconsistent or reluctant contact with medical and social care organisations</li> <li>● Accumulation of untaken medication</li> <li>● Uncharacteristic failure to engage in social interaction</li> <li>● Inappropriate</li> </ul> |
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|   | <p>or inadequate clothing</p>  |
| <p><b>Self-neglect</b></p> <p>Self-neglect is an extreme lack of self-care to an extent that it threatens personal health and safety. It covers a wide range of behaviour such as neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding. It includes:</p> <ul style="list-style-type: none"> <li>• Lack of self-care to an extent that it threatens personal health and safety</li> <li>• Neglecting to care for one's personal hygiene, health or surroundings</li> <li>• Inability to avoid self-harm</li> <li>• Failure to seek help or access services to meet health and social care needs</li> <li>• Inability or unwillingness to manage one's personal affairs</li> </ul> | <p>Possible indicators includes:</p> <ul style="list-style-type: none"> <li>• Very poor personal hygiene</li> <li>• Unkempt appearance</li> <li>• Lack of essential food, clothing or shelter</li> <li>• Malnutrition and/or dehydration</li> <li>• Living in squalid or unsanitary conditions</li> <li>• Neglecting household maintenance</li> <li>• Hoarding</li> <li>• Collecting a large number of animals in inappropriate conditions</li> <li>• Non-compliance with health or care services</li> <li>• Inability or</li> </ul> |



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|  | unwillingness<br>to take<br>medication or<br>treat illness or<br>injury |
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## Appendix 3: Staff roles & responsibilities

### **Safeguarding Lead for LMSU**

Responsible for the strategic and operational implementation of LMSU's Safeguarding Policy and procedure

Jacqueline Molineaux, Director of Membership / Deputy CEO

([jacqueline.molineaux@londonmet.ac.uk](mailto:jacqueline.molineaux@londonmet.ac.uk))

### **Lead Safeguarding Officer (LeSO) for the University**

Overall responsibility for the strategic and operational implementation of the University's Safeguarding policy and guidelines relating to children and vulnerable adults

Sarah Richardson, Head of Student Services ([s.richardson@londonmet.ac.uk](mailto:s.richardson@londonmet.ac.uk)).

### **Local Safeguarding Officers (LoSO) for the University**

Each School and Professional Service Department within the University has an officer responsible for providing immediate support, and for liaising with the University's Lead Safeguarding Officer and a reserve in case of absence.

The Local Safeguarding Officers for LMSU are:

- Andy Morwood, CEO ([andy.morwood@londonmet.ac.uk](mailto:andy.morwood@londonmet.ac.uk))
- Jacqueline Molineaux, Director of Membership / Deputy CEO



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([jacqueline.molineaux@londonmet.ac.uk](mailto:jacqueline.molineaux@londonmet.ac.uk))

If neither are available, anyone wishing to report a concern can find a list of other Local Safeguarding Officers within the University at <https://www.londonmet.ac.uk/about/policies/safeguarding/>

### **All staff and volunteers**

Responsible for:

- Being aware of the Safeguarding Policy and procedure and their responsibilities under these
- Reporting safeguarding concerns to the relevant Local Safeguarding Officer

## Appendix 4: Safeguarding procedure flowchart

