

# Safeguarding Policy

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## Document Version Control

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The Safeguarding Policy will be reviewed annually by our Senior Management Team (SMT). Any amendments require the approval of our Senior Management Team.

## 1. Introduction

At Bloomsbury Institute we are committed to creating and sustaining a safe, positive and mutually supportive environment that is driven by a culture that rewards kindness and care of the individual. This is one of the guiding principles that underpins our ethical behaviour. We are committed, therefore, to ensuring the safety and wellbeing of all our students, staff and any visitors who might access our facilities or services. Our Safeguarding Policy is one of the key documents that all staff are required to read. In addition, the wellbeing and development of our students is further guided by our Strategic Framework which places at the heart of the education we offer, a relationship that cares and nurtures the student as they work towards their goals. It is the welfare of the student and the wider community that guides us in the interventions that we make.

We also recognise the added responsibility we have in relation to the safeguarding of any vulnerable adult or child who either applies and is admitted to Bloomsbury Institute, or who may come into contact with one of our students or staff members (as a result of the latter's work or study) or any visitor who accesses its facilities or services.

This document sets out the policy and procedures we have drawn up to mitigate risk and address any safeguarding concerns that might nevertheless arise. This includes ensuring that there are clear guidelines and procedures for reporting concerns and that appropriate action is taken.

This policy document has been guided not only by our own perceived duty of care, but also by legislation such as the Children Act 1989, the Safeguarding Vulnerable Groups Act 2006 (and as amended by the Protection of Freedoms Act 2012), the Equality Act 2010 and the Counter Terrorism and Security Act 2015, inter alia. It also reflects Safeguarding Children: Guidance for English Higher Education Institutions, Department for Innovation, Universities and Skills (2007), Prevent Duty Guidance for England and Wales (2015 – last updated in April 2021), and Additional guidance on Prevent duty: Framework for monitoring in higher education in England 2018-19 onwards (September 2018).

## 2. Definitions

Under the **Safeguarding Vulnerable Groups Act 2006** there are three key definitions:

**Child or children** refers to a person or persons under the age of 18 years. This is the statutory definition of a minor. Legally, 'minors' lack the capacity to make their own decisions; however, there are exceptions to this. Children can enter into a legal contract if it is in relation to the provision of essentials such as education and accommodation. For the purposes of safeguarding, we define a child as anyone who has not yet reached their 18th birthday.

**Vulnerable adult** is defined broadly and includes persons over the age of 18 who are in receipt of any form of healthcare; live-in residential accommodation or sheltered housing; are detained in a prison; require assistance in the conduct of their affairs; receive support, assistance or advice to help them live independently or receive a service for people who have particular needs because of their age or have any form of disability (this list is not exhaustive). The provisions of the Safeguarding Vulnerable Groups Act 2006 only apply to vulnerable adults to the extent that they are the recipients or subjects of any 'regulated activity' (see below).

**Regulated activity** is also a broad concept, and applies to:

- specified activities relating to children and vulnerable adults (such as teaching, training, instruction, care or supervision) which are carried out on a frequent (as a general rule at least once a week) or intensive (four or more days in any 30-day period) basis, or overnight (between 2 am and 6 am, where the overnight activity gives the person the opportunity to have face-to-face contact with children or vulnerable adults); or

- working in a specified place (e.g., a school or residential home) which provides the opportunity for frequent contact with children or vulnerable adults; or
- certain specified positions (e.g., acting as a school governor).

The following key definitions are provided by the UK Government's **Prevent Strategy 2011**:

**Radicalisation** is defined as the process by which people come to support terrorism and extremism and, in some cases, to then participate in terrorist activity.

**Extremism** is vocal or active opposition to fundamental British values including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.

**Terrorism** is an act that endangers or causes serious violence to a person/people, causes serious damage to property, or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause. Terrorism is not confined simply to acts of violence; it extends also to non-violent acts. Non-violent terrorism takes the form of popularising views which terrorists exploit. Terrorist groups include Islamic and Far-right extremists.

**Prevent** works within a non-criminal space, using early engagement to encourage individuals and communities to challenge violent extremist ideologies and behaviours.

### 3. Scope

Safeguarding is everyone's responsibility and so all staff who are or may be working with children, young people or vulnerable adults are required to make themselves aware of the contents and implications of this policy. In doing so, they can better prepare themselves to identify students who are, or who may become, vulnerable for any number of reasons, and thereby provide the student with the support needed. Some of the causes for concern that our students may present are detailed below.

- Personal/emotional/mental health difficulties
- Feelings of alienation (including acculturation problems)
- Harassment (in all its forms), sexual misconduct, and bullying (including cyber bullying and sexting)
- Bereavement (including suspected suicides) within the student's circle of friends and family
- Attempted suicide on the part of the student
- Emergencies such as natural disasters and terrorist attacks which might impact either directly or indirectly on the student
- Responsibilities with regard to credit-rated internships and work placements<sup>1</sup>
- Abuse<sup>2</sup> or harm or the risk of abuse or harm (including honour-based violence and female genital mutilation)

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<sup>1</sup> We have a legal obligation under the Equality Act 2010 to ensure that students on internships and work placements are not discriminated against.

<sup>2</sup> Abuse covers physical, emotional, sexual, financial and discriminatory abuse as well as self-neglect and neglect and acts of omission.

- Forced marriages
- Radicalisation.

Signs or indicators of cause for concern are set out in Appendix 1.

## 4. Key principles

We believe that people, whatever their age, gender, disability, ethnic origin, religious belief or sexual orientation, have a right to be safe in the lawful activities that they choose, and a right to protection from abuse of any form. We will therefore take all safeguarding concerns (be it identified or considered) seriously and ensure that all reasonable steps are taken to address them promptly and refer them on, as deemed appropriate.

In accordance with the Equality Act 2010 and the provisions set out in our own [Equality, Diversity and Inclusion Policy](#)<sup>3</sup>, we seek to promote equality of opportunity and will seek to avoid unlawful direct and indirect discrimination, harassment (in all its forms), sexual misconduct, victimisation and unconscious bias on the basis of any of the 9 Protected Characteristics outlined within the Act.

We support the view that institutions of higher education are essentially adult environments, and, as such, cannot act *in loco parentis* (in parental capacity) for children under the age of 18. The responsibility for the welfare of a child remains ultimately with their parent(s) or legal guardian(s).

We recognise that at Bloomsbury Institute the number of applicants under the age of 18, and of members of staff and students regularly and significantly in contact with children and vulnerable adults in the course of their work, study or pastoral activity is limited. Therefore, these principles seek to provide a flexible framework, proportionate to the level of risk, and to obviate the need for a formal risk assessment.

## 5. Safe spaces

### 5.1 Our physical environment

We regard the health and safety of our staff, students and visitors to be of the highest priority. As such, we adhere strictly to the standards set out in the Health and Safety at Work Act 1974, so as to ensure the wellbeing of all those entering our premises.

As with safeguarding, we consider the provision of a healthy and safe environment to be the shared responsibility of all our staff and students, and accordingly, emphasis is placed on the communication and enforcement of health and safety rules and regulations.

Our health and safety policies and procedures are articulated in detail in our Health and Safety Management System, and our Fire Safety Management System. Both documents (available to staff from their HR Online account) are key documents which all staff are required to read, and automated monitoring processes are in place to ensure that they do so. The key points from both these documents are set out in our [Health and Safety Policy](#)<sup>4</sup> which is available on our online Quality and Enhancement Manual (QEM). For the benefit of students, we have produced a [Student Guide to Health and Safety](#)<sup>5</sup> which is available from our online QEM and from our Guides and Resources page within our Student Services site. Our Health and Safety Officer, who can be contacted via [estates.facilities@bil.ac.uk](mailto:estates.facilities@bil.ac.uk), is responsible for ensuring that staff and students are correctly informed on health and safety matters. All Bloomsbury Institute staff are also required to complete a compulsory online Health and Safety course upon joining the Institute which is then renewed on a biennial basis.

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<sup>3</sup> [www.bil.ac.uk/qem/policies/](http://www.bil.ac.uk/qem/policies/)

<sup>4</sup> [www.bil.ac.uk/qem/policies/](http://www.bil.ac.uk/qem/policies/)

<sup>5</sup> [www.bil.ac.uk/guides-and-resources/](http://www.bil.ac.uk/guides-and-resources/)

## 5.2 Our academic environment

We are committed to promoting the development of spaces for free and honest debate for the academic enrichment of our community. We strive to do this with due regard to both Section 43 of the Education (No 2) Act 1986 and our obligations under the Prevent Guidance 2015. According to Section 43 of the Education (No 2) Act 1986, we are required to take such steps as are reasonably practicable to ensure that freedom of speech within the law is secured for students, staff and visiting speakers. However, the Prevent Duty Guidance 2015 (revised in April 2021) also articulates our duty to prevent radicalisation on campus.

Our commitment to our safeguarding duties is evident also in our IT policies. Both our [Email Acceptable Use Policy](#)<sup>6</sup> and our [Internet Acceptable Use Policy](#)<sup>7</sup> are designed to protect our academic community from harm.

Our Email Acceptable Use Policy states, *inter alia*, that it is unacceptable to:

- Send or receive any material that is obscene or defamatory, or which is intended to annoy, harass or intimidate another person.
- Send or receive any material that is linked to a proscribed terrorist organisation or information that generally promotes or incites acts of violence or terrorism.

Our Internet Acceptable Use Policy is designed to safeguard students by prohibiting them from:

- Visiting and/or distributing inappropriate content or material. Inappropriate content includes: pornography and obscene or indecent images, racial or religious slurs designed to promote and incite race or religious hatred, offensive comments in relation to anyone with any of the 9 protected characteristics outlined in the Equality Act, information encouraging criminal skills, websites that are linked to a proscribed terrorist organisation and information that generally promotes or incites acts of violence or terrorism<sup>8</sup>, or materials relating to cults, gambling and illegal drugs.
- Making or posting indecent remarks, proposals or materials, including racist or sexist jokes and defamatory comments.
- Any type of illegal or criminal activity.

We are institutional members of JISC (the Joint Information Systems Committee) which provides us with access to the Janet network (Eduroam) and an automatic web filtering service. The latter is designed to support our safeguarding initiatives by preventing access to adult/sexually explicit material, tasteless and offensive content, violence, intolerance and hate etc.

## 5.3 Our academic community: the recruitment of staff

### 5.3.1 Guidelines on criminal records: staff

We will carry out an enhanced Disclosure and Barring Service (DBS) security check for individuals working with children in a 'regulated activity'<sup>9</sup>. For the purposes of regulated activity with vulnerable adults, as defined by the Safeguarding Vulnerable Groups Act 2006, we are not a provider of services entitled to request an enhanced DBS check for vulnerable adults. Nevertheless, the staff that may work with vulnerable adults are the same staff who have undergone an enhanced DBS check in respect of

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<sup>6</sup> [www.bil.ac.uk/qem/policies/](http://www.bil.ac.uk/qem/policies/)

<sup>7</sup> [www.bil.ac.uk/qem/policies/](http://www.bil.ac.uk/qem/policies/)

<sup>8</sup> We have a statutory duty to prevent individuals from being drawn into extremism and terrorism, and to report any attempted access to, or dissemination of, extremist material.

<sup>9</sup> See section 2.

children. Consequently, we routinely ask all staff within our Disability and Wellbeing team to undergo an enhanced DBS check given the work they undertake. In addition, we have a statutory duty to notify the Disclosure and Barring Service where:

- We have withdrawn permission for an individual to engage in a regulated activity (or would have withdrawn permission if the individual had not left our institution or been redeployed within it); and

at least one of the following three conditions applies:

- We believe that the individual has engaged in relevant conduct: any conduct towards a child or vulnerable adult which endangers them or would be likely to endanger them, or if repeated would or would be likely to endanger them; conduct that involves sexual material relating to children (including possession of material); conduct involving sexually explicit images involving violence against human beings (including possession of images), if it appears to the DBS that the conduct is inappropriate; or conduct of a sexual nature involving a child or vulnerable adult, if it appears to the DBS that the conduct is inappropriate;
- The individual satisfies the harm test: where the Institute believes that an individual may harm a child or vulnerable adult; cause a child or vulnerable adult to be harmed; put a child or vulnerable adult at risk of harm; attempt to harm a child or vulnerable adult; or incite another to harm a child or vulnerable adult;
- The individual has received a caution or conviction for a relevant offence (an offence specified in the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009).

As indicated, the duty to notify the DBS in these circumstances applies regardless of whether the individual has resigned, retired, been made redundant or otherwise left our institution, or has been moved to a position which does not involve regulated activity.

## 6. Functions and activities which involve safeguarding

The following provides a list of functions and activities which are known to include safeguarding responsibilities; it is not exhaustive, and staff should at all times have regard to safeguarding issues in their work.

Activities which may involve children or vulnerable adults	Relevant policies	Responsible Manager
Admission of students	<a href="#">Admissions Policy</a> <sup>10</sup>	Admissions Manager
Recruitment and appointment of staff	<a href="#">Staff Recruitment and Development Policy</a> <sup>11</sup> <a href="#">Staff Relationships Policy</a> <sup>12</sup>	People, Talent and Culture Manager
Community outreach activities hosted by the Centre for Community Engagement and Learning	<a href="#">Equality, Diversity and Inclusion Policy</a> <sup>13</sup> <a href="#">Health and Safety Policy</a> <sup>14</sup>	Deputy Chief Executive Officer

<sup>10</sup> [www.bil.ac.uk/qem/policies/](http://www.bil.ac.uk/qem/policies/)

<sup>11</sup> [www.bil.ac.uk/qem/policies/](http://www.bil.ac.uk/qem/policies/)

<sup>12</sup> [www.bil.ac.uk/qem/policies/](http://www.bil.ac.uk/qem/policies/)

<sup>13</sup> [www.bil.ac.uk/qem/policies/](http://www.bil.ac.uk/qem/policies/)

<sup>14</sup> [www.bil.ac.uk/qem/policies/](http://www.bil.ac.uk/qem/policies/)

	<a href="#">Safeguarding Policy</a> <sup>15</sup>	
Disability and Additional Needs Assessment	<a href="#">Disability Policy</a> <sup>16</sup>	Disability and Wellbeing Manager
Access to Birkbeck facilities and participation in SU activities	Birkbeck Risk Assessment	Head of Infrastructure and Estates
Participation in Bloomsbury Institute Student Guild activities	Constitution of the Guild  <a href="#">The Guild's Health and Safety Policy</a> <sup>17</sup>  <a href="#">The Guild's Equality, Diversity and Inclusion Policy</a> <sup>18</sup>	Guild Manager
Research	Ethics procedures of our academic partners where relevant  Research Ethics: Code of Practice	Chair of Research Ethics Committee
Participation in Student Engagement, Wellbeing and Success activities	<a href="#">Equality, Diversity and Inclusion Policy</a> <sup>19</sup>  <a href="#">Health and Safety Policy</a> <sup>20</sup>  <a href="#">Safeguarding Policy</a> <sup>21</sup>	Director of the Centre for Student Engagement, Wellbeing and Success

## 6.1 The admission of students under 18

Our Admissions team are responsible for checking whether any applicant is under 18. This will be done as part of standard admissions processing.

We recognise a number of benefits from admitting students who are under 18 years of age, including the fact that this contributes towards wider accessibility and greater diversity within higher education, enabling anyone with the potential to benefit from higher education study to access it.

We will ensure that regard is had to the need to protect and promote the welfare of under 18s during the admissions process and subsequently upon admission. We have a further role in safeguarding the welfare of students who are under the age of 18 on the first day of their study.

### 6.1.1 Identifying children

Our Admissions team are responsible for checking whether any applicant is under 18. This will be done as part of standard admissions processing.

Applicants aged 16 or 17, who require a visa to study in the UK should apply for a Student Visa.

<sup>15</sup> [www.bil.ac.uk/qem/policies/](http://www.bil.ac.uk/qem/policies/)

<sup>16</sup> [www.bil.ac.uk/qem/policies/](http://www.bil.ac.uk/qem/policies/)

<sup>17</sup> [www.bil-guild.org/policies/](http://www.bil-guild.org/policies/)

<sup>18</sup> [www.bil-guild.org/policies/](http://www.bil-guild.org/policies/)

<sup>19</sup> [www.bil.ac.uk/qem/policies/](http://www.bil.ac.uk/qem/policies/)

<sup>20</sup> [www.bil.ac.uk/qem/policies/](http://www.bil.ac.uk/qem/policies/)

<sup>21</sup> [www.bil.ac.uk/qem/policies/](http://www.bil.ac.uk/qem/policies/)

Where an applicant aged 16 or 17 requires a Student Visa, the Compliance Team will generate a letter via the Admissions System to be completed by the applicant's parents or legal guardian to fulfil UKVI requirements. This will require the parent/guardian to confirm:

- the relationship between the parent(s) or legal guardian and the child;
- that the parent(s) or legal guardian have given their consent to the application;
- that the parent(s) or legal guardian have given their consent to the child studying and living independently in the UK; and
- that the parent(s) or legal guardian have given their consent to the child independently travelling to the UK.

The letter must confirm if the parent(s) or legal guardian has legal custody or sole responsibility for the child. Confirmation of sole responsibility must be provided and must be a legal document. If they have sole custody, they must sign the letter. If they do not, the letter must confirm that each parent or legal guardian agrees to the contents of the letter and must be signed by both parents or legal guardian.

### **6.1.2 Selection**

The application will be assessed solely on the selection criteria for the course; age will not be a factor in the selection decision.

If there is normally a requirement to interview applicants for a particular course, then applicants under 18 applying for that course will be assessed on academic grounds alone, with the exception of, where relevant, the condition laid out in the next section.

### **6.1.3 Offer**

#### **Requirements applying to all students aged under 18 on entry**

If an offer is to be made to an applicant who will be under 18 on their first day of study, the applicant will need to attend a meeting with a member of our academic team as a condition of that offer. The purpose of the meeting is to establish whether the applicant has sufficient maturity to pursue their studies. The applicant's parents/guardians will also be invited to join the meeting should they wish to do so in order to discuss any support the applicant may need whilst studying with us. In addition, a letter will be sent to the applicant outlining the support that is available should the offer holder take up a place with us. In the case of students aged under 17, this will include any conditions which have been agreed with the student and, if necessary, their parents/guardian following a meeting with them.

Immigration regulations require an English-speaking UK Guardian to be nominated if the parent/guardian of a student under the age of 18 resides outside of the UK. The UK Guardian should be someone who can be contacted quickly in an emergency situation and cannot be a member of staff or student. This requirement does not apply to Home students aged under 18.

In addition, for overseas students aged under 18 who require a Student Visa, we are required by the UKVI to ensure that suitable care arrangements will be in place for the student's travel to the UK, reception when they arrive in the UK and living arrangements while in the UK. All students under 18 on entry who require a Student Visa will be required by the Admissions team to provide written confirmation of their travel, reception and care arrangements so that we can assess whether these are satisfactory. This requirement does not apply to Home students aged under 18.

### **6.1.4 Joining Bloomsbury Institute**

Once we are aware that a student who will be under 18 on their first day of study is likely to take up their offer of a place, Registry will notify all relevant parties within the institution of the student's age and date

of birth<sup>22</sup> and a DBS check will be undertaken on relevant staff, as appropriate. All students under 18 (regardless of their particular circumstances) will receive one to one support from a member of the Disability and Wellbeing team who will both have undergone an enhanced criminal records check (DBS). It will be the role of these members of staff to meet with the student on a regular basis and seek to support them in the light of their age. The Disability and Wellbeing Manager and the Disability and Wellbeing Advisor will not be expected to make progress reports to the student's parents or guardians, unless this has been agreed in writing by the student.

### **6.1.5 Communication with parents**

We recognise that parents are important stakeholders, particularly if the student is under 18 years old. The rights of children under the Data Protection Act 2018 are identical to those of adults, and students under 18 will be assumed to be competent to make decisions regarding their personal data. We will therefore make it clear to parents or guardians through the interview process that we cannot provide information to them about their child's progress or wellbeing without the permission of the student.

However, we will seek to balance the rights of the student with our duty of care to a student who is classed as a child and may therefore on occasion decide to contact parents or guardians should there be a reasonable level of concern about the wellbeing of the student. Such a decision would be taken by our Director of the Centre for Student Engagement, Wellbeing and Success in consultation with our Chief Operating Officer or Deputy Chief Operating Officer.

## **6.2 Disability and additional needs assessment**

We are strongly committed to equality of opportunity in our provision for all students. We are also committed to working towards supporting and enabling students with physical disabilities, sensory impairments, specific learning difficulties, mental health difficulties, and long-term medical conditions which may have a substantial impact on day-to-day activities, to take part in all aspects of our academic and social programmes.

Our approach and procedures in this area are outlined in detail in our [Disability Policy](#).<sup>23</sup> Students are encouraged to disclose any disability or additional needs that they may have to our dedicated Disability and Wellbeing team in order for us to support them more fully in their studies. See Appendix 4.

## **6.3 Access to Birkbeck facilities**

We have a service agreement with Birkbeck College whereby Birkbeck provides us with teaching space and Library facilities for use by both our students and staff. Birkbeck College is committed to managing its activities in such a way as to ensure that the health, safety and welfare of all employees, students, and any other persons on its premises are not put at risk. Our presence on Birkbeck premises is therefore covered by Birkbeck's own [Health and Safety Policy](#)<sup>24</sup> and all other relevant policies relating to the management of its space. As users of Birkbeck space, we also have a duty under Section 8 of the Health and Safety at Work Act (1974) not to interfere with or to misuse anything provided by Birkbeck in the interests of health and safety.

It is illegal for alcohol to be sold to or bought by students who are under the age of 18 years. Birkbeck College will take reasonable steps to ensure that the law is not broken in relation to licensed premises under the College's control but cannot undertake to supervise any individual student. The same is true of us should we host any activities in any licensed premises.

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<sup>22</sup> The information on date of birth will serve to notify us of the point at which the student ceases to be classed as a child.

<sup>23</sup> [www.bil.ac.uk/qem/policies/](http://www.bil.ac.uk/qem/policies/)

<sup>24</sup> The policy and further information relating to health and safety can be found at the following link: <http://www.bbk.ac.uk/so/>

All events that are organised and run by Birkbeck's Students' Union, including all events of clubs and societies, are required to follow health and safety rules, be within the Equality Act 2010 and, where necessary, have an associated risk assessment. Health and Safety includes, but is not limited to:

- Physical and mental health and safety of persons present
- Mitigation of risk at events which could cause alarm or offence to attendees
- Personal safety of people attending the event as guests or speakers
- Avoidance of situations which cause people undue stress or anxiety

Under equality law, all events must not unlawfully discriminate against any of the Protected Characteristics (age, sex, sexual orientation, race, disability, marital/partnership status, pregnancy and maternity, religion, gender reassignment) of the Equality Act 2010.

## 6.4 Participation in Bloomsbury Institute Student Guild activities

Our Student Guild organises and runs its own events including those of its clubs and societies. Any event is required to follow the Student Guild's Health and Safety rules and to comply with the Equality Act 2010. Additionally, and where necessary, events will have an associated risk assessment undertaken. Health and Safety includes, but is not limited to, the same considerations listed above for events held on Birkbeck College premises.

## 6.5 Children on Birkbeck premises

Birkbeck College (whose space we use for teaching and library purposes) will allow students and visitors to bring their children onto Birkbeck premises only for social purposes such as organised functions or for brief visits that are restricted to low hazard areas. However, the children must remain under the supervision of an adult at all times. For more information, you should refer to [Birkbeck's Guidance Notes on Children, Young Persons and Vulnerable Adults on Birkbeck premises](#)<sup>25</sup>. These conditions are also applicable to Bloomsbury Institute premises, such as 7 Bedford Square and Great Portland Street.

## 6.6 Research ethics

Research projects or programmes involving vulnerable participants (e.g., individuals under 18 years of age, and vulnerable adults) require approval by our Research Ethics Committee to ensure compliance with statutory requirements and best practice guidelines. Approval procedures are outlined in our [Research Ethics Code of Practice](#)<sup>26</sup>. This Code of Practice applies to all staff who undertake research within the scope of their employment with Bloomsbury Institute as well as to any students undertaking collaborative research with one of our staff members. It does not apply to students who are undertaking research as part of our awarding body's degree. Our awarding body's research ethics procedure and guidance apply to such students.

# 7. Responsibilities

Primary frontline responsibility for student welfare or pastoral support lies with our Centre for Student Engagement, Wellbeing and Success (SEWS) in the form of our Success Champions, the Student Engagement and Success Manager and our Disability and Wellbeing team. The Director of SEWS is the point of contact for any safeguarding referrals raised by the SEWS team or other third parties (including both staff and students).

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<sup>25</sup> [www5.bbk.ac.uk/so/policies/child/printable](http://www5.bbk.ac.uk/so/policies/child/printable)

<sup>26</sup> [www.bil.ac.uk/qem/policies/](http://www.bil.ac.uk/qem/policies/)

## 8. Referring safeguarding concerns

We acknowledge that the signs or indicators of abuse or harm or risk of abuse or harm can be very difficult to recognise and so we do not expect staff to take responsibility for deciding whether a child or adult has been abused or harmed or subjected to abuse or harm, but only to *raise* concerns that they may have been. Any concerns raised will be dealt with in confidence. Although you may feel that the concern you have is relatively small and possibly isolated, you are encouraged to share it with the Director of our Centre for Student Engagement, Wellbeing and Success (SEWS) because others may have already shared similar concerns and when considered together, these multiple concerns could present a very compelling argument for either safeguarding intervention of a general nature or intervention by the Prevent Lead if there is a suggestion that the concern is a Prevent-related matter.

The Director of SEWS will record any concerns and action taken in our *Safeguarding Referral Form*. See Appendix 5. Upon investigation, if the Director of SEWS decides that the concern is Prevent-related, he or she will refer the issue to the Prevent Lead who will follow the appropriate procedures laid out in our Prevent Policy. If, however, there is no Prevent angle, the Director of SEWS will address the concern directly. For the Safeguarding Referral Process, see Appendix 6.

The Safeguarding Referral forms completed by the Director of SEWS and/or Prevent Lead will be stored together with any accompanying evidential documents by the owners in a secure site (be it in electronic or hard copy format).

It is important to remember that any concerns regarding a student or staff member should be treated with discretion. Information about the individual concerned should only be shared on a “need to know” basis and stored with due regard to the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR), and Bloomsbury Institute’s [Data Protection Policy](#)<sup>27</sup> and [Confidentiality Policy](#).<sup>28</sup>

## 9. Training and support

We recognise the importance of awareness raising and training in relation to the safeguarding of students and have therefore incorporated such areas as Prevent, equality, diversity and inclusion, bullying and harassment and unconscious bias training in our Continuing Professional Development programme. In addition, several academic and professional services staff are certified Mental Health First Aiders, and all new staff are inducted on the range of our policies and procedures that are available from our online [Quality and Enhancement Manual](#).

Students are also informed of the expectations we have of them in relation to what can best be defined as the principles of *respect*, as outlined in our [Dignity and Respect Policy](#).<sup>29</sup> They too are expected to comply with all the policies we have put in place to safeguard our academic community. The expectations we have of students are articulated in our [Student Charter](#).<sup>30</sup>

## 10. Relationships with students

Under the Sexual Offences (Amendment) Act 2000, it is a criminal offence for any person in a position of trust (which may include members of staff) to engage in sexual activity with someone who is under 18 years. Bloomsbury Institute’s [Harassment and Sexual Misconduct Policy](#)<sup>31</sup> clearly outlines what constitutes sexual harassment, sexual misconduct and consent, and the [Staff Relationships Policy](#)<sup>32</sup> sets out our position on personal relationships at work, providing in depth guidance on how concerns can be raised, the procedures that will be followed, and the support and protection that will be provided to those raising a concern.

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<sup>28</sup> [www.bil.ac.uk/qem/policies/](http://www.bil.ac.uk/qem/policies/)

<sup>29</sup> [www.bil.ac.uk/qem/policies/](http://www.bil.ac.uk/qem/policies/)

<sup>30</sup> [www.bil.ac.uk/qem/policies/](http://www.bil.ac.uk/qem/policies/)

<sup>31</sup> [www.bil.ac.uk/qem/policies/](http://www.bil.ac.uk/qem/policies/)

<sup>32</sup> [www.bil.ac.uk/qem/policies/](http://www.bil.ac.uk/qem/policies/)

## 11. Breaches of policy

Any breaches of our Safeguarding Policy or allegations of misconduct will be treated both seriously and promptly. The responsive measures taken will depend on the nature of the activity or incident concerned. Our [Student Disciplinary Policy and Procedures](#)<sup>33</sup> would be invoked in the event of suspected cases of student misconduct whilst our Staff Disciplinary Procedure would be initiated in the case of a staff member. Misconduct would include such acts as physical violence, bullying, harassment (in all its forms), sexual misconduct, as detailed in our [Harassment and Sexual Misconduct Policy](#)<sup>34</sup>, and breaches of our equality, diversity and inclusion policies etc.

## 12. Related regulations, policies and procedures

- Admissions Policy
- Dignity and Respect Policy
- Disability Policy
- Email Acceptable Use Policy
- Equality, Diversity and Inclusion Policy
- Fire Safety Management System
- Harassment and Sexual Misconduct Policy
- Health and Safety Management System
- Health and Safety Policy
- Internet Acceptable Use Policy
- Prevent Policy
- Privacy Notice
- Research Ethics: Code of Practice
- Staff Disciplinary Procedure
- Staff Recruitment and Development Policy
- Staff Relationships Policy
- Student Disciplinary Policy and Procedures
- Student Guide to Health and Safety
- Awarding body's research ethics procedure and guidance

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<sup>33</sup> [www.bil.ac.uk/qem/policies/](http://www.bil.ac.uk/qem/policies/)

<sup>34</sup> [www.bil.ac.uk/qem/policies/](http://www.bil.ac.uk/qem/policies/)

### **13. Review of the Safeguarding Policy**

The Safeguarding Policy will be reviewed annually by our Senior Management Team (SMT). Any amendments require the approval of our Senior Management Team.

## Appendix 1: Signs or indicators of cause for concern<sup>35</sup>

- Evidence of physical signs of abuse or unexplained or unusual injuries (as a result of self-harm or abuse by others)
- Showing signs of pain or physical discomfort
- Keeping arms and legs fully covered even in hot weather
- Evidence of bullying, harassment (in all its forms), sexual misconduct, victimisation or intimidation
- Student reports suicidal thoughts
- Unusual weight loss or gain
- Smell of alcohol
- Deterioration in personal hygiene
- Social isolation, lack of friends, difficulties in social relationships
- Excessive friendliness/signs of affection/promiscuity
- Generalised restlessness or fatigue
- Excessive tearfulness
- Awareness of student taking non-prescribed drugs
- The way the student speaks – flat tone, very quiet, loud, fast or agitated
- Difference in mood – high, low, miserable, sad or tired
- Low self-esteem
- Displays of fear, anxiety, agitation, unhappiness or distress without identifiable cause, or in relation to certain people
- Dismissive or intolerant attitudes
- A quickness to anger, intolerance, close mindedness
- The overstepping of professional or acceptable boundaries by staff, students or visitors
- Unusual behaviour – bizarre, hostile or aggressive
- The expression of extremist views
- Advocating violent actions and means

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<sup>35</sup> Three sources: <https://www.scie.org.uk/safeguarding/adults/introduction/types-and-indicators-of-abuse>  
<https://shorturl.at/kxAMW>  
<https://actearly.uk/spot-the-signs-of-radicalisation/what-to-look-for/>

- Decline in academic performance
- Lack of engagement both physically and academically. Student goes missing without notice
- Other people express serious concern.

In addition, the following factors may indicate that an individual is vulnerable or at risk in some way<sup>36</sup>

- **Identity Crisis:** Distance from cultural/religious heritage and uncomfortable with their place in the society around them
- **Personal Crisis:** Family tensions; sense of isolation; adolescence; low self-esteem; disassociating from existing friendship group and becoming involved with a new and different group of friends; searching for answers to questions about identity, faith and belonging
- **Personal Circumstances:** Migration; local community tensions; events affecting country or region of origin; alienation from UK values; having a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy
- **Unmet Aspirations:** Perceptions of injustice; feeling of failure; rejection of civic life
- **Criminality:** Experiences of imprisonment; poor resettlement/reintegration, previous involvement with criminal groups.

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<sup>36</sup> These may be particularly indicative of a vulnerability to the risk of radicalisation.

## Appendix 2: Guidance for Under 18s Letter

Dear Student,

As a student who has accepted a place at Bloomsbury Institute and who will be under 18 when you enrol, you were sent a letter inviting you and your parents/guardians to meet staff to discuss any support you may need whilst at our institution.

As this is a matter of importance to us, we would now like to remind you of some of the key considerations that you and your parents/guardians need to be aware of. These considerations are outlined below. Please read and discuss these carefully with your parents/guardians. Accompanying this letter is an *Agreement to Study Form*. You and your parents/guardians need to complete, scan and return it by email to [admissions@bil.ac.uk](mailto:admissions@bil.ac.uk).

Anyone under the age of 18 living in England is legally a child. Higher education institutions have a statutory and moral duty of care towards all of their students, regardless of their age, but we particularly recognise the need to maintain a safe environment for students who are under 18 years of age.

Like most higher education institutions, we are a predominantly unsupervised and adult environment. Activities connected with your studies will involve Bloomsbury Institute staff, fellow students and others, and may take place on a one-to-one basis or within a group setting (i.e. you may be studying alongside older students). Additionally, some extra-curricular activities we recommend to our students may take place off-campus with minimal supervision.

We expect all students to have the necessary skills to study alongside others from a wide range of ages. Additionally, we expect all students to act responsibly, maturely and in accordance with English laws and Bloomsbury Institute regulations.

As a legal minor under English law (someone under 18 years of age), you will be subject to certain restrictions until you reach the age of 18. These will be discussed with you during your induction.

We will not act in loco parentis (in parental capacity) toward our students, nor will we monitor how students spend their leisure time or manage their personal affairs. Facilities and services for students at Bloomsbury Institute are designed predominantly for students over the age of 18.

Once you have discussed the above with your parents/guardians, please both complete the *Agreement to Study Form* and then scan and email it to [admissions@bil.ac.uk](mailto:admissions@bil.ac.uk).

We look forward to welcoming you to Bloomsbury Institute. Thank you for your cooperation.



John Fairhurst  
Principal and Chief Executive Officer

## Appendix 3: Agreement to Study Form

This agreement form needs to be completed by **students and their parent(s)/guardian(s)** once they have read the accompanying *Bloomsbury Institute's Guidance for Under 18s* letter.

### Personal details

Full name of student:

Date of Birth (DD/MM/YY):

Course applied for at Bloomsbury Institute:

Course start date (DD/MM/YY):

### Section 1 (To be completed by student)

#### Student agreement

Please read the statements below and sign to confirm that you agree to them:

- I understand and accept the information provided in Bloomsbury Institute's Guidance for Under 18s letter.
- I understand and accept that there will be some activities (e.g. consume alcohol in college bars) which I will not be able to do.
- I understand and accept that:
  - a. I will comply with UK laws and *Bloomsbury Institute's* rules and regulations
  - b. In the case of an emergency, *Bloomsbury Institute* reserves the right to contact my 'emergency contact' without first seeking my permission
  - c. I will comply with all conditions on the use of facilities belonging to or utilised by *Bloomsbury Institute* and *Bloomsbury Institute's Student Guild*, including access restrictions and the sale of alcohol.

Signature:

Date

## Section 2 (To be completed by Parent/Guardian)

### *Emergency contact details*

Emergency contact in **home country** for the period the student is at Bloomsbury Institute:

Name:

Relationship to student:

If emergency contact does not speak English, what is their first language?

Address:

Telephone number 1:

Land line

Mobile

Telephone number 2:

Land line

Mobile

UK Guardian / Emergency Contact in **United Kingdom** for the period student is at Bloomsbury Institute:

Name:

Relationship to student:

If UK Guardian / Emergency Contact does not speak English, what is their first language?

Telephone number 1:

Land line

Mobile

Telephone number 2:

Land line

Mobile

Please describe the arrangements for the student's **travel** to the UK:

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Please describe the arrangements for the student's **reception** in the UK (where the student will go when they arrive, who will meet them etc):

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Please describe the student's **living arrangements** while in the UK:

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## Parent/Guardian agreement

Please read the statements below and sign to confirm that you agree to them:

- I give consent that my child can live and travel independently.
- I understand and accept the information provided in *Bloomsbury Institute's Guidance for Under 18s* letter.
- I understand and accept that I remain legally responsible for the student named above until they reach their 18<sup>th</sup> birthday.
- I confirm that the student is sufficiently mature to embark on their studies and consent to the student studying with you and participating in such extracurricular activities as the student shall determine.
- I accept that it is my responsibility to ensure suitable accommodation is found for the student.
- I accept that Bloomsbury Institute's obligation of confidentiality is owed to the student and to nobody else. Accordingly, other than in an emergency, Bloomsbury Institute shall not share confidential information, for example about a student's academic progress, to a parent or anyone else without the consent of the student.

Signature: \_\_\_\_\_

2<sup>nd</sup> Signature: \_\_\_\_\_

\_\_\_\_\_

Date: \_\_\_\_\_

Please ensure that all sections have been completed and return a scanned copy of this form to [admissions@bil.ac.uk](mailto:admissions@bil.ac.uk)

**To contact us please ring 020 7078 8840 during office hours.**

**An emergency out of hours contact number will be provided to all under 18s upon arrival.**

## Appendix 4: Consent to Share Information Form

Name:		Date of Birth:	
Course:		LON:	

### How we use your data

The Disability Office will hold and use the information you provide to arrange the support that you have requested. Bloomsbury Institute provides this support in order to meet its contractual obligations to you and to comply with its duty under the Equality Act 2010 to provide reasonable adjustments to students with disabilities. To ensure this support can be delivered, the Disability Office will need to share information about you, your physical and/or mental health, Specific Learning Difficulty (SpLD) and information about your disability with those who have a role in providing academic, administrative or support services e.g. your tutor, your supervisor, course administrators, library staff, as well as external providers for funded support, or needs assessment centres/assessors. We will also need to share information with your funding bodies in order to confirm your entitlement to financial support. We will as far as possible limit the information to be shared on each occasion to the minimum necessary for the provision of support.

### Consent

Please indicate below, by **ticking the relevant box**, whether you consent to us processing your information in the way described above under 'How we use your data'.

<b>I consent to full disclosure within the above limits</b>	Yes		No	
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<b>I consent to restricted disclosure within the above limits</b>	Yes		No	
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Signature		Date:	
		Print Name:	

### Your rights

You have the right at any time to refuse or withdraw your consent for us to process your data or to refuse or withdraw consent for certain processing activities. You may do this by emailing the Disability and Wellbeing team directly or [disability@bil.ac.uk](mailto:disability@bil.ac.uk). However, please be aware that withdrawing or limiting consent may have an adverse effect on our ability to help you and may mean we cannot provide study support to you. In some circumstances we may need to continue to process your data even though you have withdrawn consent. Further information on your rights, as a data subject, in relation to your personal information is available in our [Privacy Notice](#)<sup>37</sup>.

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<sup>37</sup> [www.bil.ac.uk/qem/policies/](http://www.bil.ac.uk/qem/policies/)

## **Retention**

We will retain your record for as long as you continue to use the service and will delete it 6 years after you leave Bloomsbury Institute. If you need more information about this, please contact [dpo@bil.ac.uk](mailto:dpo@bil.ac.uk).

## Appendix 5: Safeguarding Referral Form

### CONFIDENTIAL

#### Section A: Personal details of the person about whom there is a safeguarding concern

Name	
Date of Birth	
Job Role or Student Number (if relevant)	
Address	
Telephone Number	
Email Address	

#### Section B: Person reporting the incident/concern

Name	
Job role or student number as applicable	
Telephone Number	
Email Address	
Relationship to student or staff member	

#### Section C: Reasons for referral

Outline the reasons for the referral
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#### Section D: Action taken

Outline any action taken (and by whom) prior to referral of the incident or concern.

Detail any conversations that have taken place with the individual concerned regarding the above, indicating who has been involved in those discussions.

#### Section E: Other staff informed

Name(s)	
Position	

Name(s)	
Position	

Name(s)	
Position	

#### Section F: External partners informed

Name	
Position/Organisation	
Contact details	

#### Section G: Form completed by

Name	
Signed	
Date	

**CARE:** This information is confidential and should only be shared on a “need to know basis” if it will protect the individual about whom the safeguarding concern has been expressed or if it will protect those around the aforementioned individual.

## Appendix 6: Safeguarding Referral Process

