

Safeguarding Policy

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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 (because of study or work) 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) and Prevent Duty Guidance for England and Wales (2023), and Prevent duty guidance – a briefing for Higher [Education](#) Providers (HEPs)¹

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

¹ [DfE - Prevent Duty Guidance - Briefing Note Higher Education final \(educateagainsthate.com\)](#)

- 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 the promotion or advancement of an ideology based on violence, hatred or intolerance that aims to:

1. negate or destroy the fundamental rights and freedoms of others; or
2. undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
3. intentionally create a permissive environment for others to achieve the results in (1) or (2).

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 and lived 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 placements²

² We have a legal obligation under the Equality Act 2010 to ensure that students on internships and work placements are not discriminated against.

- Abuse³ or harm or the risk of abuse or harm (including honour-based violence and female genital mutilation)
- 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](#)⁴, 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 mainly limited to outreach and recruitment activities. Therefore, these principles seek to provide a flexible framework, proportionate to the level of **risk**.

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 Policy](#)⁵ is available on our online Quality and Enhancement Manual (QEM). And for the benefit of students, we have produced a [Student Guide to Health and Safety](#)⁶ which is also available via the QEM. Our Estates and Facilities Manager can be contacted via estates.facilities@bil.ac.uk, and 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.

³ Abuse covers physical, emotional, sexual, financial, and discriminatory abuse as well as self-neglect and neglect and acts of omission.

⁴ www.bil.ac.uk/qem/section-3/

⁵ www.bil.ac.uk/qem/section-3/

⁶ www.bil.ac.uk/qem/section-3/

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 the Higher Education (Freedom of Speech) Act 2023 and our obligations under the Prevent Duty Guidance 2023. According to the Higher Education (Freedom of Speech) Act 2023, 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. In addition, the Prevent Duty Guidance for England and Wales 2023 articulates our duty to prevent the risk of people becoming terrorists or supporting terrorism.

Our commitment to our safeguarding duties is evident also in our IT policies. Both our [Email Acceptable Use Policy](#)⁷ and our [Internet Acceptable Use Policy](#)⁸ 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 terrorism⁹, 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 (Eduroam) with secure encryption and authentication standards. The latter is the secure, world-wide roaming access service developed for the international research and education community and 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'¹⁰. 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

⁷ www.bil.ac.uk/qem/section-3/

⁸ www.bil.ac.uk/qem/section-3/

⁹ 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.

¹⁰ See section 2.

with vulnerable adults are the same staff who have undergone an enhanced DBS check in respect of children. Consequently, we routinely ask all staff within our Disability and Wellbeing Office 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	Admissions Policy ¹¹	Deputy COO
Recruitment and appointment of staff	Staff Recruitment and Development Policy ¹² Staff Relationships Policy ¹³	People, Talent and Culture Manager
Community outreach activities hosted by the Centre for Community Engagement and Learning	Equality, Diversity and Inclusion Policy ¹⁴ Health and Safety Policy ¹⁵	Deputy Chief Executive Officer

¹¹ www.bil.ac.uk/qem/section-3/

¹² www.bil.ac.uk/qem/section-3/

¹³ www.bil.ac.uk/qem/section-3/

¹⁴ www.bil.ac.uk/qem/section-3/

¹⁵ www.bil.ac.uk/qem/section-3/

	Safeguarding Policy ¹⁶	
Student Recruitment Activities and Open Days	Equality, Diversity and Inclusion Policy ¹⁷ Health and Safety Policy ¹⁸ Safeguarding Policy ¹⁹	Deputy Chief Executive Officer
Disability and Additional Needs Assessment	Disability Policy ²⁰	Disability and Wellbeing Manager
Access to Birkbeck facilities	Birkbeck Risk Assessment	Estates and Facilities Manager
Participation in Bloomsbury Institute Student Guild activities	Constitution of the Guild The Guild's Health and Safety Policy ²¹ The Guild's Equality, Diversity and Inclusion Policy ²²	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	Equality, Diversity and Inclusion Policy ²³ Health and Safety Policy ²⁴ Safeguarding Policy ²⁵	Director of the Centre for Student Engagement, Wellbeing and Success

6.1 The admission of students under 18

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 enrolment. 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.

¹⁶ www.bil.ac.uk/qem/section-3/

¹⁷ www.bil.ac.uk/qem/section-3/

¹⁸ www.bil.ac.uk/qem/section-3/

¹⁹ www.bil.ac.uk/qem/section-3/

²⁰ www.bil.ac.uk/qem/section-3/

²¹ www.bil.ac.uk/qem/section-3/

²² www.bil.ac.uk/qem/section-3/

²³ www.bil.ac.uk/qem/section-3/

²⁴ www.bil.ac.uk/qem/section-3/

²⁵ www.bil.ac.uk/qem/section-3/

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 and relevant departments will be notified accordingly.

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

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.

If the applicant will be living with a close relative or private foster carer, that close relative or foster carer must provide a letter of undertaking which contains the following information:

- the name, current address and contact details of the intended carer; and
- the address where the intended carer and the applicant will be living in the UK, if different from the intended carer's current address; and
- confirmation that the accommodation offered to the applicant is a private address, and not operated as a commercial enterprise, such as a hotel or a youth hostel; and
- the nature of the relationship between the applicant's parent(s) or legal guardian and the intended carer; and
- that the intended carer agrees to the care arrangements for the applicant; and
- that the intended carer has at least £570 per month available to look after and accommodate the applicant, for each month of the course up to a maximum of 9 months; and
- a list of any other people that the intended carer has offered to support; and
- the intended carer's signature and date of the letter of undertaking.

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, date of birth²⁶ 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 Office who will 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 light of their age. The Disability and Wellbeing Manager 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 or guardians

We recognise that parents or guardians 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 and Chief Financial Officer or the Deputy Chief Operating Officer

6.2 Working with children in schools and colleges

Our work in raising awareness and widening participation with our education partners can begin from Year 9, both at their location and/or on our campus. To protect and promote the welfare of under-18s during this work, we have the following processes in place:

²⁶ 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.

- Student Recruitment Officer is DBS-approved.
- Our Partner’s safeguarding processes apply and are followed. This includes gaining consent from parents when visiting Bloomsbury Institute.
- Partners coming onto campus are required to ensure the correct ratio of staff to children and remain ultimately responsible for their care.

6.3 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](#)²⁷. Students are encouraged to disclose any disability or additional needs that they may have to our dedicated Disability and Wellbeing Office in order for us to support them more fully in their studies. See Appendix 4.

6.4 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 students, employees, 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](#)²⁸ 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.

6.5 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 Policy](#) 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.

6.6 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](#).

²⁷ www.bil.ac.uk/qem/policies/

²⁸The policy and further information relating to health and safety can be found at the following link: <http://www.bbk.ac.uk/so/>

[Young Persons and Vulnerable Adults on Birkbeck premises](#)²⁹. These conditions are also applicable to Bloomsbury Institute premises, such as 7 Bedford Square and Great Portland Street.

6.7 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](#)³⁰. 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 Senior Success Champion, the Student Engagement and Success Manager and our Disability and Wellbeing Manager. The Director of SEWS is our designated Safeguarding Officer and is therefore the point of contact for any safeguarding referrals raised by the SEWS team or other third parties (including both staff and students).

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](#)³¹ and [Confidentiality Policy](#).³² Queries in relation to data protection can be referred to the Institute's Data Protection Officer via dpo@bil.ac.uk.

²⁹ www5.bbk.ac.uk/so/policies/child/printable

³⁰ www.bil.ac.uk/qem/section-3/

³¹ www.bil.ac.uk/qem/section-3/

³² www.bil.ac.uk/qem/section-3/

9. Training and support

We recognise the importance of awareness raising and training in relation to the safeguarding of students and have therefore incorporated areas such as Prevent, equality, diversity and inclusion and bullying and harassment 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](#).³³ 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](#).³⁴

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](#)³⁵ clearly outlines what constitutes sexual harassment, sexual misconduct and consent, and the [Staff Relationships Policy](#)³⁶ 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.

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](#)³⁷ 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](#)³⁸, 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
- Harassment and Sexual Misconduct Policy

³³ www.bil.ac.uk/qem/section-3/

³⁴ www.bil.ac.uk/qem/section-3/

³⁵ www.bil.ac.uk/qem/section-3/

³⁶ www.bil.ac.uk/qem/section-3/

³⁷ www.bil.ac.uk/qem/section-3/

³⁸ www.bil.ac.uk/qem/section-3/

- 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
- Suicide Prevention **and Response Plan**

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 concern³⁹

- 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

³⁹ 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 way⁴⁰

- **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.

⁴⁰ 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.

Anyone under the age of 18 living in England is legally a child. Higher education institutions have a 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 and those of its partners where relevant.

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.

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:

Email Address

Mobile

Telephone number 2:

Email Address

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:

Email Address

Mobile

Telephone number 2:

Email Address

Mobile

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

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):

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

Parent(s)/Guardian(s) 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 18th 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: _____

2nd Signature: _____

Date: _____

Please ensure that all sections have been completed and return a scanned copy of this form to 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 and Wellbeing 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 and Wellbeing 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'.

I consent to full disclosure within the above limits	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
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I consent to restricted disclosure within the above limits	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
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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 Office directly or 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](#)⁴¹.

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.

⁴¹ www.bil.ac.uk/qem/policies/

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

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 Students Referral Process

DO:

- Remain calm.
- Put your safety first.
- Ask for advice or escalate concerns where necessary.
- Familiarise yourself with the Safeguarding Policy via www.bil.ac.uk/qem/section-3/.

DON'T:

- Promise confidentiality – you may have to alert others in order to keep the student safe.
- Assume that signs below always point to a safeguarding concern: take the whole situation into account.

