

Safeguarding Policy

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1. Introduction

At the London School of Business and Management (LSBM) we have embraced the ethos of Servant Leadership and so the “care of everyone” within our academic community has become one of the guiding principles that underpins our ethical behaviour. We are committed, therefore, to ensuring the safety and well-being of all our students, staff and any visitors who might access our facilities or services. In addition, the well-being and development of our students is further guided by our Student Success Strategy 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 LSBM, or who may come into contact with an LSBM student or member of staff (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 identifying risk, 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 Tier 4 sponsor guidance, *Safeguarding Children: Guidance for English Higher Education Institutions*, Department for Innovation, Universities and Skills (2007), and *Prevent Duty Guidance for England and Wales* (2015).

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. Obvious terrorist groups include Islamist extremists and white supremacists.
- **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 intend to, or may be put in the position of, 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 problems
- Feelings of alienation (including acculturation problems)
- Harassment 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 work placements¹
- Abuse² or harm or the risk of abuse or harm (including honour-based violence and female genital mutilation)
- Forced marriages

¹ We have a legal obligation under the Equality Act 2010 to ensure that students on placements are not discriminated against. We also recognise our wider safeguarding duties by providing students on placements with a Health and Safety Checklist.

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

- 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, we seek to promote equality of opportunity and will seek to avoid unlawful direct and indirect discrimination, harassment, victimisation and unconscious bias on the basis of any of the 9 Protected Characteristics outlined within the Act.

We support the view that Higher Education Institutions are essentially adult environments, and, as such, cannot act *in loco parentis* 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 the number of applicants under the age of 18, and of members of staff and students regularly and significantly exposed to 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.

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 well-being 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 is explained verbally to all staff and students who are also notified of the location of the policy in our online Quality Enhancement Manual (QEM). Our Health and Safety Officer is responsible for ensuring that staff and students are correctly informed on health and safety matters.

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 Guidance 2015 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 and our Internet Acceptable Use Policy 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 terrorism³, 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.

In addition, although we do not currently block any sites based on URLs, we do conduct content filtering designed to prevent access to adult/sexually explicit material, tasteless and offensive content, violence, intolerance and hate etc.

5.3 Our academic community: the recruitment of staff and students

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 and vulnerable adults in a 'regulated activity'. In addition, we have a statutory duty to notify the Independent Safeguarding Authority (ISA) where:

- permission has been withdrawn from an individual to engage in a regulated activity (or would have been withdrawn if the individual had not left the College); 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 ISA that the conduct is inappropriate; or conduct of a sexual nature involving a child or vulnerable adult, if it appears to ISA that the conduct is inappropriate;
 - the individual satisfies the harm test: where the College 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;

³ 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.

- 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 ISA in these circumstances applies regardless of whether the individual has resigned, retired, been made redundant or otherwise left the College, or has been moved to a position which does not involve regulated activity.

5.3.2 Guidelines on Criminal Records: Students

We have a duty of care to all our students and staff. We will use the information declared relating to criminal convictions to ensure we fulfil our responsibilities and obligations for the safeguarding of staff and students.

Applicants are currently required to disclose unspent “relevant” criminal convictions on the UCAS form or through our online application system. A relevant conviction is defined as: (i) offences against the person, whether of a violent or sexual nature; and (ii) offences involving the unlawful supply of controlled drugs or substances where the conviction concerns commercial drug dealing or trafficking. Convictions that are spent, as defined by the Rehabilitation of Offenders Act 1974, are not considered to be relevant.

An unspent relevant criminal conviction will not necessarily exclude an applicant from being offered a place on one of our courses. We will assess an applicant with an unspent relevant criminal conviction in order to ensure our staff, our students and the applicant will not be put at risk if the applicant is admitted onto one of our courses. This assessment will be made by one of our Academic Deans. An applicant’s failure to disclose an unspent relevant criminal conviction may lead to an offer of a place being withdrawn or disciplinary action being taken if an applicant has been enrolled. This section should be read in conjunction with the document: Policy and Procedures relating to Criminal Convictions.

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	Admission of Students under the age of 18 Policy and Procedure relating to Criminal Convictions	Head of Admissions and Academic Administration
Recruitment and appointment of staff	Staff Recruitment and Development Policy	Academic Principal
Disability and Additional Needs Assessment	Disability Procedures	Disability and Student Welfare Co-ordinator
Access to Birkbeck facilities and participation in SU activities	Birkbeck risk assessment	Health and Safety Officer
Participation in LSBM Student Guild activities (as of October 2016)	Constitution of the Guild	Guild Manager
Children on premises	Risk Register	Academic Registrar
Research	Ethics Procedures of our academic partner, the University of Northampton	Director of Centre for Research & Enterprise

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 who is able 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

Radius, our Admissions and Enrolment System, will send an alert to the Admissions Officer if an applicant is under 18. This will be done alongside the existing procedures for checking criminal convictions, disability and academic record.

Applicants aged under 18 who require a Tier 4 visa to study in the UK should apply for a Tier 4 (General) visa, which is available to applicants aged 16+.

Where an applicant aged 16 or 17 requires a Tier 4 (General) visa, the Admissions Officer 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 student living independently in the UK; and
- that the parent(s) or legal guardian have given their consent to the child student's independent travel to the UK.

The letter must confirm if the parent(s) or legal guardian has legal custody or sole responsibility for the child. 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 each parent or legal guardian.

6.1.2 Selection

The application should then be assessed solely on the selection criteria for the course; age should 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.

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, a letter will be sent outlining the support that is available should the offer holder take up a place. In the case of students aged under 17, this will include the conditions which have been agreed with the student and 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/EU students aged under 18.

In addition, for overseas students aged under 18 who require a Tier 4 (General) 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 Tier 4 (General) Visa will be required by the Admissions Office 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/EU students aged under 18.

6.1.4 Joining LSBM

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 LSBM of the student's age and date of birth⁴. A risk assessment will then be carried out in consultation with the student and their parents to identify any specific measures that need to be taken for the particular student concerned. All students under 18 (regardless of their particular circumstances) will be assigned a Personal Academic Tutor (PAT) who will have undergone an enhanced criminal records check (DBS). It will be the role of the PAT to meet with the student on a regular basis and seek to support them in the light of their age. The PAT will not be expected to make progress reports to the student's parents, unless this has been agreed in writing by the student.

Additionally, the student will be given a point of contact outside their PAT, normally the Disability and Student Welfare Co-ordinator, to whom they can go to if they have any concerns. The Disability and Student Welfare Co-ordinator will be obliged to contact the student once a term to enquire about their well-being.

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 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 through the interview process that we cannot provide information to parents about their child's progress or well-being 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 well-being of the student.

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, special psychological needs and medical conditions which may have an 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 Procedures document which is available from our online Quality Enhancement Manual. Students are encouraged to disclose any disability or additional needs that they may have 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 and Computing 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 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

⁴ The information on date of birth will serve to notify us the point at which the student ceases to be classed as a child.

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.

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, gender/sex, sexual orientation, race, disability, marital/partnership status, religion, gender reassignment) of the Equality Act 2010.

6.4 Participation in LSBM Student Guild activities

To be completed October 2016 with the creation of the LSBM Student Guild.

6.5 Children on Birkbeck premises

Birkbeck College (whose space we use for teaching, computing 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*.

6.6 Research Ethics

Research projects or programmes involving children and adults at risk require Ethics Committee approval to ensure compliance with statutory requirements and best practice guidelines.

7. Responsibilities

Primary frontline responsibility for student welfare or pastoral support lies with our Student Engagement and Success (SES) Division in the form of our Student Success Advisors and our Disability and Student Welfare Co-ordinator as well as with our academic staff in their capacity as Personal Academic Tutors (PATs). The Head of SES is the point of contact for any safeguarding referrals raised by the SES team, PATs 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. 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 Head of Student Engagement and Success (SES) 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 Head of Quality if there is a suggestion that the concern is a Prevent-related matter.

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

The Safeguarding Referral forms completed by the Head of SES and/or Head of Quality will be stored together with any accompanying evidential documents by the owners in a secure site (be it in electronic or hard copy format). The same level of confidentiality and security will be maintained by the Academic Registrar for any referrals made to him.

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.

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, and equality, diversity and inclusion training in our Continuing Professional Development programme. In addition, all new staff are inducted on the range of LSBM 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*. They too are expected to comply with all the policies we have put in place to safeguard our academic community.

10. Assessment of risk and safety measures

A designated individual should complete a Risk Register (see Appendix 7) before any new or changed programme, event, visit or any other activity involving children, young people or vulnerable adults, is introduced. The purpose of the assessment is to help mitigate or remove any potential risks and will therefore include

- A health and safety risk assessment
- Consideration of under 18s and vulnerable adults who are particularly at risk
- Identification of any potential areas for harm and detail the action to prevent harm occurring
- Identification of which staff (and, where relevant, students) will require a CRB check

Additional risk assessments will be undertaken in response to any safeguarding concerns raised and for any new student under the age of 18 at enrolment.

11. 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. Any concerns or suspicions of an abuse of trust or inappropriate behaviour on the part of a member of staff should be reported to the Academic Principal.

12. 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 would be invoked in the event of suspected cases of student misconduct whilst our Staff Disciplinary Procedures would be initiated in the case of a staff member. Misconduct would include such acts as physical violence, bullying, harassment, breaches of our equality, diversity and inclusion policies etc.

Appendix 1

Signs or Indicators of Cause for Concern

- 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, 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

- 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 way⁵

- **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

⁵ 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 the London School of Business and Management (LSBM) and will be under 18 when you enrol, you were sent a letter inviting 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@lsbm.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 LSBM 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 LSBM 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 unduly monitor how students spend their leisure time or manage their personal affairs. Facilities and services for students at LSBM 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@lsbm.ac.uk.

We look forward to welcoming you to LSBM. Thank you for your cooperation.



John Fairhurst
Managing Director and Academic Principal

Appendix 3

Agreement to Study Form

This agreement form needs to be completed by **students and their parents/guardians** once they have read the accompanying *London School of Business and Management's Guidance for Under 18s* letter.

Personal Details

Full name of student:

Date of Birth (DD/MM/YY):

Course applied for at LSBM

Course start date (DD/MM/YY):

Student Agreement (to be completed by student)

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

- I understand and accept the information provided in the *London School of Business and Management's Guidance for Under 18s* letter.
- I understand and accept that there will be some activities (e.g. drink in College bars) which I will not be able to do.
- I understand and accept that:
 - a. I will comply with UK laws and the *London School of Business and Management's* rules and regulations
 - b. In the case of an emergency, the *London School of Business and Management* 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 the *London School of Business and Management* and the University of London Students' Union including access restrictions and the sale of alcohol.

Signature:

Date

To be completed by Parent/Guardian

Emergency Contact Details

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

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 _____

Emergency Contact in **England*** for the period student is at LSBM:

Name: _____

Relationship to student: _____

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

Telephone number 1:

Land line _____

Mobile _____

Telephone number 2:

Land line _____

Mobile _____

**If you do not have an Emergency Contact in England, please provide a second one in your country.*

We may contact you if we have concerns about the information which you provide in this section.

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/Guardian Agreement

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

- I understand and accept the information provided in *LSBM'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 consent to the student undertaking the course and participating in such extracurricular activities as the student shall determine.
- I accept that the London School of Business and Management's obligation of confidentiality is owed to the student and to nobody else. Accordingly, other than in an emergency, the London School of Business and Management shall not divulge confidential information, for example about a student's academic progress, to a parent or anyone else without the consent of the student.

Signature: _____

Date: _____

Please ensure that all sections have been completed and return a scanned copy of this form to admissions@lsbm.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

Disability Confidentiality Consent Form

What is this form for?

Our Student Engagement and Success Division co-ordinates support for students with disabilities and/or dyslexia. In accordance with the Disability Discrimination Act Part IV (DDA), the London School of Business and Management respects your rights to confidentiality with respect to your disability and is also committed to providing you with appropriate support.

The Disability Discrimination Act, Part IV, places a duty on Higher Education Institutions:

- not to treat students with disabilities less favourably than other students
- to make **reasonable adjustments** where disabled students might otherwise be placed at a substantial disadvantage

To meet these obligations to you Higher Education Institutions are expected to take reasonable steps to find out about a student's disability. Once a student has disclosed a disability even if only to one staff member, or once an institution might reasonably be expected to know about a student's disability (for example, if it is visible), we have a responsibility to provide appropriate support. However you also have a right to confidentiality under the Data Protection Act and may wish to limit or deny disclosure of information regarding any disability. The forms below are designed to allow you to decide specifically if or to whom any information regarding your disability is disclosed.

Why disclose information

We appreciate that coming to the London School of Business and Management is a challenge as well as an opportunity, but the College is committed to your success. We have experience of providing support to students with disabilities to enhance their potential for success.

If, however, you have concerns with regard to confidentiality, you can opt to keep all the information about your disability and consequent needs entirely confidential. In this case, the Disability and Student Welfare Co-ordinator will not disclose any details or information you give to her to anyone. This is your right, but inevitably means that where the staff are not aware of your needs, such support as you receive is likely to be inconsistent, ad hoc and at a lower level than we would wish to provide. **If you decide that any information regarding your disability should remain entirely confidential please complete and sign Part 1 of the form below only.**

If you want the London School of Business and Management to provide support, Section 2 of the form is designed to enable you to decide from whom you will seek assistance and the Disability and Student Welfare Co-ordinator will discuss with you what support each could provide. You are then free to inform them yourself or you can authorise the Disability and Student Welfare Co-ordinator to do so on your behalf. There will be no disclosure of any information to any third party prior to your signing the form and every effort will be made to see that any disclosure is both relevant and necessary to further your case.

At any time you can alter the level of confidentiality regarding disclosure of information by simply completing another Confidentiality Consent Form with the Disability and Student Welfare Co-ordinator.

Please sign and complete either Part 1 (Non-Disclosure) or Part 2 (Consent to Disclosure).

Confidentiality Consent Form

Part One: Non-Disclosure

I _____ (please insert name) do not give consent for information related to my disability to be passed on and I accept that this may result in my needs not being met.

Signature: _____

Date: _____

This form will be kept in the Student Engagement and Success Division Confidential Files.

NOTE: The Disability Team will keep your information in your personal file, as well as on a database that is only available to members of the Disability Team.

Part Two: Consent to Disclosure

I _____ (please insert name) consent to: (tick as appropriate):

- the holding of the documents listed in A below
- the disclosure of details of my specific support needs to staff in the departments selected in B below.

A) Consent to holding information

- Educational Psychologist and or medical report detailing support needs
- The report produced after your Assessment of Need
- Any other relevant documents

B) Consent to Disclosure to

- Student Engagement and Success Division
- College (including Course Leader and involved teaching staff)
- Exams Office/Boards
- Library
- Registry
- Safety Officer
- Other (Please specify external provider for one-to-one support (DSA))

Signatures

Student Signature: _____

Date: _____

Staff Signature: _____

[Disability and Student Welfare Co-ordinator]

Date: _____

This form will be kept in the Student Engagement and Success Division Confidential Files.

NOTE: The Disability Team will keep your information in your personal file, as well as on a database that is only available to members of the Disability Team.

Appendix 5

Policy and Procedure relating to Student Criminal Convictions

Introduction

Students applying for or studying University of Northampton programmes

The London School of Business and Management (LSBM) will adhere to the relevant University policy and procedures in place.

Students applying for or studying non-degree courses

We will follow and apply the procedures contained in this document. Reference should also be made to Section 8 of our Admissions Policy.

We have a duty of care to all our students and staff. We will use the information declared relating to criminal convictions to ensure we fulfil our responsibilities and obligations for the safeguarding of staff and students.

Applicants are required to disclose unspent “relevant” criminal convictions on the UCAS form or through our online application system. A relevant conviction is defined as: (i) offences against the person, whether of a violent or sexual nature; and (ii) offences involving the unlawful supply of controlled drugs or substances where the conviction concerns commercial drug dealing or trafficking. Convictions that are spent, as defined by the Rehabilitation of Offenders Act 1974, are not considered to be relevant. An unspent relevant criminal conviction will not necessarily exclude an applicant from being offered a place on one of our courses. We will assess an applicant with an unspent relevant criminal conviction in order to ensure our staff, our students and the applicant will not be put at risk if the applicant is admitted onto one of our courses. This assessment will be made by one of our Academic Deans.

An applicant’s failure to disclose an unspent relevant criminal conviction may lead to an offer of a place being withdrawn or disciplinary action being taken if an applicant has been enrolled. This section should be read in conjunction with the document: Policy and Procedures relating to Criminal Convictions.

Grounds for Refusing Admission

1. The test that we will use is whether the criminal record of an applicant/student gives reasonable grounds for considering that the admission/continuation of studies of the individual:
 - (a) poses a real threat to the safety or property of staff, students, visitors, those coming into contact with the applicant during their studies or others involved in our business; or
 - (b) would be contrary to the law or to the requirements/guidance of any relevant professional or other regulatory body.
2. In addition to the above, where third parties are involved in the delivery of a course/ programme, applicants/students may also have to meet the requirements of such third parties.

Process

3. All applicants are required to disclose relevant unspent (and in the circumstances mentioned above, spent) offences when applying for admission to LSBM. If information relating to offences

is not given or is given in incomplete form, then we the right at any stage to reject the application. Applicants also agree where required to submit to additional criminal record checks and other relevant enquiries.

4. Once a criminal record has been disclosed to us by an applicant in the admissions process, the application will initially be considered in the normal way alongside all other applications. The criminal record will only be considered if the applicant has achieved all other criteria that would otherwise mean that they would be admitted to LSBM. If the applicant would otherwise be admitted, then the Deputy Academic Principal and Head of the Student Engagement and Success (SES) Division will review the applicant in the light of the information relating to the criminal record. The Deputy Academic Principal and Head of SES may consult with others at any time they think appropriate. In many cases, they will then go on to seek further background information on circumstances surrounding the criminal record. In particular they may consider any or all of the following:
 - whether the criminal record or other matter revealed is relevant to the programme on offer (including any secondments or placements);
 - the seriousness of any offences;
 - the number of any offences;
 - whether the offences show a pattern of behaviour that seems to be recurrent and ongoing;
 - whether the offences involve violence or threats of violence;
 - whether the circumstances surrounding the offences were unique;
 - whether the applicant's circumstances have now changed; and
 - what evidence the applicant produces to support the view that the applicant is unlikely to offend again.
5. The Deputy Academic Principal and Head of SES may require the applicant to provide information from other third parties who may have a view on the above matters. The parties may include probation officers and others who are professionally or personally involved in the rehabilitation of or familiar with the applicant.
6. A decision regarding admission shall be made by the Deputy Academic Principal and Head of SES and the relevant Dean. Before a decision is reached the Head of Admissions and Academic Administration will be consulted. The latter will in particular try to ensure that there is consistency in treatment towards applicants across LSBM. If necessary the Head of Admissions and Academic Administration may consult with LSBM's Legal Advisor, Academic Registrar and/or Academic Principal in the execution of their duties.
7. As soon as a decision has been reached, the applicant will be advised as to whether or not their application to LSBM has been successful. Such confirmation shall always be in writing. If admission has not been allowed, then notification will provide a summary of the reasons why.
8. If an applicant has been denied admission then he/she may appeal to the Academic Registrar. Such appeal must be lodged in writing within 14 days of the date of the written notification of the decision that admission has been denied.
9. If a student obtains a criminal record after admission then the matter shall be dealt with under either our Student Disciplinary Policy and Procedures (non-degree students) or the Disciplinary Procedure of the University of Northampton (degree students). Factors mentioned under Section 8 may again be considered.

Ongoing Obligations

10. Where applicants have been admitted to LSBM and are likely to come into contact with vulnerable persons e.g. children, or in the opinion of the Academic Registrar there is good reason to believe that a false declaration of a criminal record has been made, then applicants must agree to submit to a criminal records check.
11. If at any stage between application and completion of a course/ programme of study an individual is charged with an offence that would ordinarily lead to a custodial sentence or is convicted of a criminal offence, then they shall immediately inform the Academic Registrar or his/her nominee. If any action is taken by LSBM on the assumption that a conviction is likely and it transpires that the individual is not convicted then following a written request by the individual to the Academic Registrar, LSBM shall review its earlier decision to take action.

False Declaration or Failure to Declare

12. If at any stage an applicant/student fails to disclose accurately information required on their past criminal record, then this will be regarded as an extremely serious matter and may lead to any offer being withdrawn, or if the applicant has commenced their programme of study, the student may be required to cease their studies.

Security

13. Except where third parties are involved in the delivery of the relevant programme of study all information provided by an applicant/student relating to their criminal record will not be disclosed outside of LSBM.
14. Information within LSBM relating to criminal records will be restricted to only those who are involved in any of the processes detailed above.
15. All information relating to criminal records will be kept securely. In particular documents will be stored in locked filing cabinets and access to keys or combinations to those filing cabinets will be restricted.
16. Where documents are stored electronically, files will be password protected. Generally, no information on applicant's/student's criminal records will be kept for longer than six months after completion of the admissions process or, if admitted onto a programme of study, six months after completion of that programme by the student.

Appendix 6

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

<i>Outline any action taken (and by whom) prior to referral of the incident or concern</i>
<i>Detail any conversations that have taken place with the individual concerned regarding the above, indicating who has been involved in those discussions.</i>

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 7

Risk Register

Assessment of Corporate Risk

See guide below on the Institution's approach to the assessment of corporate risk.

Key of Risk Ratings:

Risk Rating	Score	Action taken or to be taken
High	12-20	Unacceptable level of risk exposure which requires immediate corrective action
Medium	6-10	Acceptable level of risk exposure which requires regular active monitoring measures
Low	1-5	Acceptable level of risk exposure which requires periodic passive monitoring measures

Risk	Cause	Impact	Impact Score (1-4)	Likelihood Score (1-5)	Risk Rating	Action taken or to be taken	SMLT Review Date

London School of Business and Management Risk Assessment Guide

Individual risk assessments are carried out for each risk identified, looking at the **impact** that the risk could cause for the College and the **likelihood** of the risk occurring.

1. An assessment of the **impact** of the risk is made taking into account the following criteria, where applicable:

	Financial	Outcomes	Deadlines	Resources
Major 4	Major loss of income	Complete failure to achieve intended outcomes	No deadlines achieved	Loss of all key staff, equipment, accommodation or other critical resources
Significant 3	Significant loss of income	Failure to achieve the majority of intended outcomes	Significant slippage of milestones and/or completion	Significant shortfall in key staff, equipment, accommodation or other critical resources
Moderate 2	Moderate loss of income	Failure to achieve a minority of intended outcomes	Moderate slippage of milestones and /or completion	Moderate shortfall in key staff, equipment, accommodation or other critical resources
Minor 1	Minor loss of income	Failure to achieve only less critical intended outcomes	Slight slippage of milestones and /or completion	Slight shortfall in key staff, equipment, accommodation or other critical resources

2. This is followed by an assessment of the **likelihood** of the risk occurring:

Score	Degree of Likelihood	Likelihood Definition
5	Likely	There is a perceived 75% (or greater) chance of it occurring.
4	Probable	There is a perceived 50-75% chance of it occurring.
3	Possible	There is a perceived 25-49% chance of it occurring.
2	Remote	There is a perceived 5-24% chance of it occurring.
1	Improbable	There is a perceived less than 5% chance of it occurring.

3. An assessment of the **Risk Rating** is made, using the matrix below:

		Impact			
		Minor	Moderate	Significant	Major
Likelihood of Risk		1	2	3	4
Improbable	1	1	2	3	4
Remote	2	2	4	6	8
Possible	3	3	6	9	12
Probable	4	4	8	12	16
Likely	5	5	10	15	20

Risk Rating Key	Low	Medium	High
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4. The following risk ratings key is used to ascertain the required action

Risk Rating	Score	Action
High	12-20	Unacceptable level of risk exposure which requires immediate corrective action
Medium	6-10	Acceptable level of risk exposure which requires regular active monitoring measures
Low	1-5	Acceptable level of risk exposure which requires periodic passive monitoring measures