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## **GBS Safeguarding Policy**

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#### Related GBS policies

- GBS Data Protection Policy
- GBS Equality and Diversity Policy
- GBS Freedom of Speech Code of Practice
- GBS Anti-Harassment and Anti-Bullying Policy – Staff, Students
- GBS Student Disciplinary Policy and Procedure
- GBS Staff Disciplinary Policy
- GBS Email Use Policy
- GBS CCTV Policy and Procedure
- GBS Social Media Policy
- GBS Whistleblowing Policy
- GBS Information Computing Technology (ICT) Policy
- GBS Student Charter
- GBS Student Code of Conduct

#### External Reference Points

1. Information Commissioner’s Office, Accessed online at:  
<https://ico.org.uk/>
2. UK Public General Acts, *Data Protection Act 2018*, Accessed online at:  
<https://www.legislation.gov.uk/ukpga/2018/12/contents/enacted>
3. UK Public General Acts, *Computer Misuse Act 1990*, Accessed online at:  
<https://www.legislation.gov.uk/ukpga/1990/18/contents>

4. Care Act 2014  
<https://www.legislation.gov.uk/ukpga/2014/23/contents/enacted>
5. Human Rights Act 1998  
<https://www.legislation.gov.uk/ukpga/1998/42/contents>
6. Safeguarding Vulnerable Groups Act 2006  
<https://www.legislation.gov.uk/ukpga/2006/47/contents>

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## **GBS Safeguarding Policy**

### **1. Policy statement**

1.1. Global Banking School (GBS) recognises the importance of safeguarding. The purpose of this policy is to outline the principles and procedures that we have adopted to ensure the safety and wellbeing of young people and adults at risk of harm, including our staff, students, apprentices, users of our facilities, and those who engage in activities that we have organised. GBS aims to provide a safe, inclusive environment, conducive to work, learning, scholarly activity, and the enjoyment of a positive experience to all at GBS.

### **2. Purpose**

2.1. This policy outlines GBS' commitment to safeguarding. Our aim is to safeguard the safety and wellbeing of the young people and adults at risk of harm, whilst at the same time protecting freedom of speech and embedding a commitment to the promotion of positive learning and community relations. With this aim in mind, we will:

- Publish guidance and procedures for identifying risk, reporting concerns and taking action.
- Take all safeguarding concerns seriously and report them promptly to the relevant authority, where appropriate, including suspicions and allegations of exploitation, harm, or abuse.
- Ensure we have processes in place to check the suitability of staff and students whose roles and responsibilities involve regular contact with, or supervision of, young people and adults at risk of harm.
- Provide training for staff who are in routine and direct contact with young people and adults at risk of harm.
- Foster a culture of trust between those who work at GBS, those who attend it, young people and visitors.
- Prevent people who pose a risk of harm from working or studying at GBS.
- Ensure staff receive appropriate safeguarding training which is regularly updated.

2.2. Staff should be aware of and be able to effectively respond to a range of safeguarding issues. The list given below is not intended to be exhaustive but is indicative of the types of issues that might lead a person to be deemed as 'vulnerable':

- Domestic violence.
- Peer to peer bullying
- self-harm.
- Mental health issues.
- Online risks.
- Physical abuse, which includes rough handling or any other unnecessary or unwarranted physical force.
- Sexual abuse.
- Psychological abuse, which includes emotional abuse, threats of harm, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, and verbal abuse.
- Financial or material abuse which includes exploitation, misuse or misappropriation of property, theft, and fraud.
- Discriminatory abuse, which includes racism, sexism, cultural, religious and abuse based on disability.

### **3. Scope**

3.1. This policy applies to:

- All full-time, part-time, sessional, and temporary staff employed by, or working for or on behalf of GBS.
- All students studying at GBS.
- Contractors and consultants working for GBS.
- All other individuals or groups, including visitors, who have been granted access to GBS ICT and facilities.
- Young people aged under 18 years, and Adults at Risk (as defined by Section 42 of the Care Act 2014).

3.2. Every individual defined within the scope of this document is responsible for the implementation of this policy.

### **4. Key Definitions**

4.1. Young people: references to “young people” in this policy means anyone under the age of 18 years.

4.2. Adult at Risk: GBS bases its definition of an “Adult at Risk” on that used within the Care Act 2014 and defines an Adult at Risk as someone over 18 years of age who (i)

has needs for care and support; (ii) is experiencing, or is at risk of experiencing abuse or neglect; and (iii) as a result of those needs is unable to protect themselves against the abuse or neglect or the risk of it.

4.3. Safeguarding: in defining our approach towards young people, GBS draws on the definition used by the DfE in Keeping Children Safe in Education 2022 (KCSE). While KCSE only applies to schools and colleges, we will play our part in:

- Protecting young people from maltreatment.
- Preventing impairment of young people's mental or physical health and development.
- Taking action to enable all young people to have the best outcomes.

4.4. Safeguarding Adults at Risk: while GBS is not subject to the provisions of the Care Act 2014, we draw broadly on this act to inform our policy on safeguarding Adults at Risk. We will play our part to:

- Ensure that the rights of Adults at Risk are protected to enable them to live in safety, free from abuse and neglect.
- Ensure that the wellbeing of the Adults at Risk is promoted and that in deciding on any action to be taken we will consider their views, wishes, feelings and beliefs, for example when considering whether to refer concerns to statutory bodies or when seeking support from charitable organisations.

## 5. Responsibilities

5.1. The Head of Student Welfare is the GBS designated lead for safeguarding. GBS has specific responsibility to promote good safeguarding practice and ensure that the Safeguarding Policy and related procedures are fit for purpose. The GBS safeguarding lead will:

- Ensure that the Safeguarding Policy and accompanying procedures, advice and guidance are fit for purpose and sufficient to ensure that GBS meets its statutory obligations and complies generally with good practice and where reasonably possible.
- Ensure that faculty and professional services departments are aware of their duties under the Safeguarding Policy and receive any assistance

that they may require to arrange appropriate training and guidance on safeguarding procedures.

- Ensure that appropriate safeguarding training is available for GBS staff who work with young people and Adults at Risk.
- Ensure that that processes and procedures are in place for relevant recruitment checks and that these are conducted for relevant roles.
- Ensure that routes to report or escalate safeguarding concerns are clearly signposted, accessible, and appropriately monitored.
- Ensure that reported safeguarding concerns are reviewed, specialist guidance sought, and appropriate action taken to escalate internally and/or to the relevant external agency within statutory time frames.
- Prepare and submit referrals as appropriate to OfS, the Local Authority Designated Officer, the Multi Agency Safeguarding Hub and/or Local Authority Children's or Adults Safeguarding Board.
- Ensure that GBS is aware of its responsibilities to safeguard young people and Adults at Risk whether they are acting as a paid member of GBS staff or supporting GBS-led activity in an unpaid capacity as a volunteer.
- Ensure that all are aware of how to report a safeguarding concern (*Annex 1*). Any such concerns can be reported verbally or via the GBS's Safeguarding email – [safeguarding@globalbanking.ac.uk](mailto:safeguarding@globalbanking.ac.uk)

## **6. Legislation**

### **6.1. Legislative Requirements and Statutory Guidance**

6.1.1. The Policy is established to meet the following statutory requirements:

- Care Act 2014
- Children Act 1989
- Children Act 2004
- Data Protection Act 2018, the General Data Protection Regulation and the Data Protection (processing of Sensitive Personal Data) Order 2000
- Domestic Abuse Act 2021
- Equality Act 2010
- Human Rights Act 1998
- Safeguarding Vulnerable Groups Act 2006



- Protection of Freedoms Act 2012
- Sexual Offences Act 2003
- Mental Capacity Act 2005, and the Mental Capacity (Amendment) Act 2019
- HM Government (2018) Working together to safeguard children. A guide to inter- agency working to safeguard and promote the welfare of children.
- Management of Health and Safety at Work Regulations 1999

## 6.2. Equality and Diversity

6.2.1. The Equality Act 2010 provides protection against discrimination, harassment, and victimisation on the grounds of disability and other protected characteristics. It is a legal duty for higher education institutions to anticipate needs and make reasonable adjustments so that disabled students are not placed at a substantial disadvantage compared to students who are not disabled.

## 6.3. Working with Partners and Information Sharing

6.3.1. GBS will share information with local organisations, as appropriate. GBS may also share specific information about an individual or a group of individuals engaged in any actual or suspected unlawful activity, which would pose a risk to the safety or wellbeing of others. In reaching a decision to share information with third parties, GBS will adhere to our Data Protection Policy and take any decision in the context of our Freedom of Speech Policy. GBS will refer to and maintain communication with external agencies in relation to safeguarding, where necessary. This includes children and adults safeguarding boards, MARAC, Police, NHS & therapeutic services.

## 6.4. Training and Referral Procedure

6.4.1. The staff body will receive annual training on safeguarding. New staff will complete mandatory training during their onboarding. Members of staff who hold responsibility for safeguarding will be given training and participate in workshops to ensure staff understand GBS Safeguarding Policy. Training and workshops for GBS staff will involve:

- The context and expectations of Safeguarding
- Duties and responsibilities of GBS, its staff and students
- Referral procedures for suspected cases of abuse

- Definitions of terminology and how to identify vulnerable individuals and risks
- Understanding the importance of their own behaviour and professionalism and not discussing inflammatory subjects with students within the context of GBS Freedom of Speech Policy.
- Ensuring Student Representatives and the wider student body are fully aware of this policy and associated procedures. This will include:
  - understanding terminology
  - understanding how to refer a student of concern.
  - importance of maintaining a supportive, respectful, and tolerant culture in GBS

6.5. If any member of staff or student is concerned about another staff member or student or group of students, they must contact [safeguarding@globalbanking.ac.uk](mailto:safeguarding@globalbanking.ac.uk). GBS Safeguarding Lead will manage student concerns and make the necessary referrals.

## **7. Monitoring and Review**

7.1. This policy may be amended by GBS at any time and will be reviewed annually, reporting to Academic Board to ensure it is fit for purpose. The annual report will include the number of safeguarding cases across partnerships and campus specific. No protected information will be shared in the report.

## **8. Data Protection and Confidentiality**

8.1. GBS is registered with the Information Commissioner's Office as a Data Controller. Details of the School's registration are published on the Information Commissioners website. GBS as a Data Controller shall implement appropriate technical and organisational measures to ensure that processing of personal information is performed in accordance with the UK General Data Protection Regulations (UK GDPR) and under the Data Protection Act 2018 (DPA).

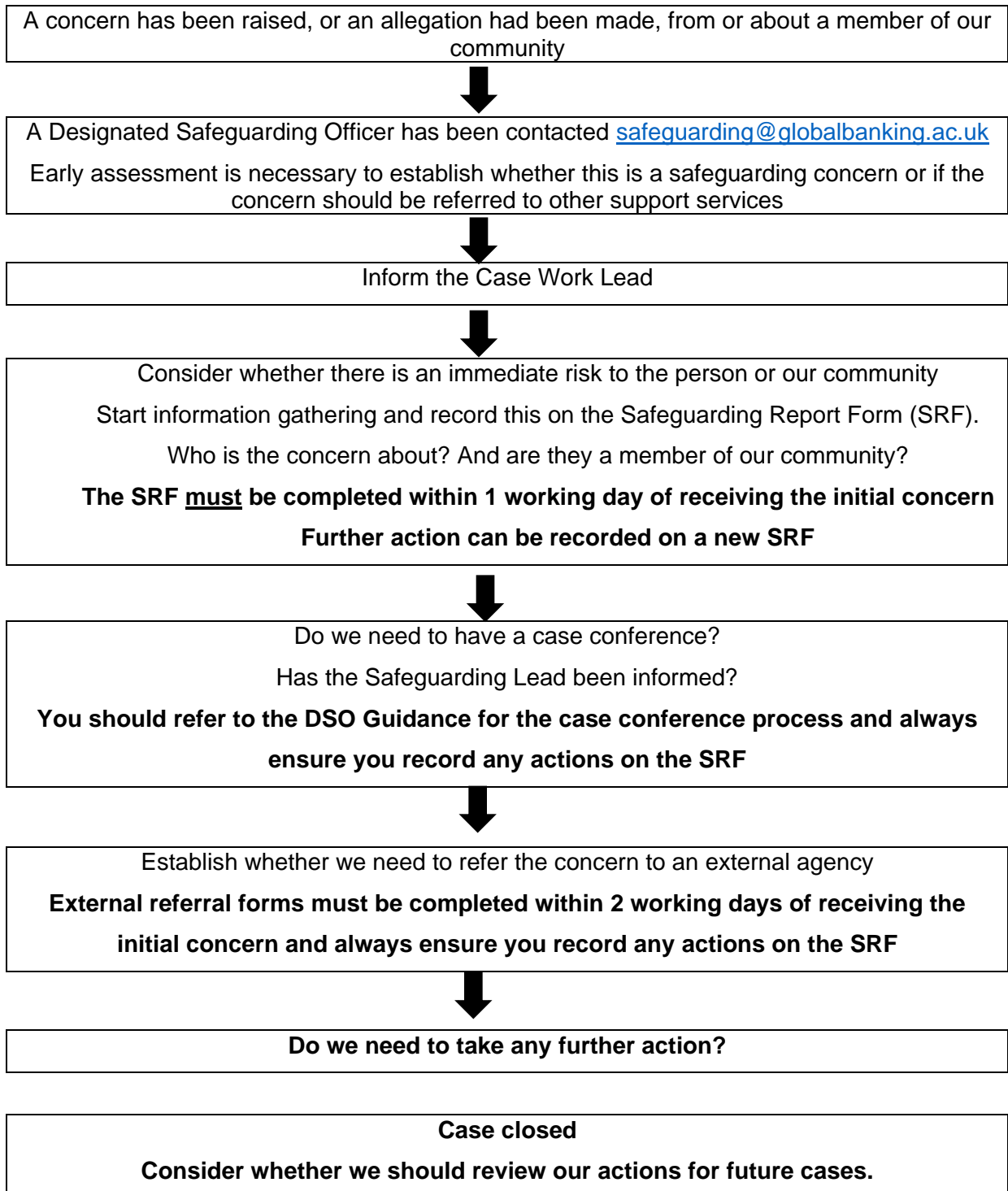
8.2. The UK GDPR and DPA regulates the use and storage of personal information (i.e., any information which identifies a living individual) on computing systems. It is the user's responsibility to ensure that their information and computer usage complies with this law. Failure to do so could result in criminal charges being brought against both you and GBS.

- 8.3. GBS recognises that all matters relating to safeguarding will only be shared with individuals who need to be made aware of the situation to appropriately discharge GBS' responsibilities and duty of care. All GBS staff must be aware that they have a responsibility to immediately disclose information which, if not shared, may compromise a student's safety or welfare. All GBS staff will be fully supported by the GBS Safeguarding Lead.

## **9. Alternative Format**

- 9.1. This policy can be provided in alternative formats (including large print, audio and electronic) upon request. For further information, or to make a request, please contact the Academic Standards and Quality Office at [asqo@globalbanking.ac.uk](mailto:asqo@globalbanking.ac.uk).

### Annex 1: Process for Escalating a Safeguarding Concern



## **Annex 2: Useful Information**

The Care Act 2014 introduces responsibilities for local authorities. It also has major implications for adult care and support providers, people who use services, carers and advocates. It replaces No Secrets and puts adult safeguarding on a statutory footing.

<https://www.legislation.gov.uk/ukpga/2014/23/contents/enacted>

The general principle is that everybody over the age of 16 years has capacity unless it is proved otherwise; people should be supported to make their own decisions, anything done for or on behalf of people without capacity must be in their best interests and should be the least restrictive intervention

[https://www.legislation.gov.uk/ukpga/2005/9/pdfs/ukpga\\_20050009\\_en.pdf](https://www.legislation.gov.uk/ukpga/2005/9/pdfs/ukpga_20050009_en.pdf)

Further Education and Training (FET) Providers are expected to take responsibility for the safeguarding of their learners which extends beyond the physical FE environment. Any signs of learners, or colleagues being at risk whether on the programme or not is something that we need to action or refer.

<https://www.et-foundation.co.uk/professional-development/safeguarding-prevent/designated-safeguarding-lead/safeguarding-guidance-and-legislation-for-adults-and-children/>

The Equality Act 2010 legally protects people from discrimination in the workplace and in wider society. It replaced previous anti-discrimination laws with a single Act, making the law easier to understand and strengthening protection in some situations. It sets out the different ways in which it's unlawful to treat someone.

<https://www.legislation.gov.uk/ukpga/2010/15/contents>