



Fairfield School of Business

Safeguarding Policy

January 2022

Version 6.0

Approved by the Board of Governors

For Public Use

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To file a report or seek guidance, contact the Campus Designated Safeguarding Officer (DSO):

- **Croydon Site:**

(Male) Naveed Shah*: Naveed.shah@fairfield.ac +44 (0) 208 681 8305 ext.313
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- **Digbeth Site:**

(Male) Atif Mannan*: atif.mannan@fairfield.ac; +44(0) 121 634 1590 ext.249
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If the DSO cannot be contacted, concerns should be directed to the School's Designated Safeguarding Lead (DSL): brikena.muharremi@fairfield.ac

Concerns about the wellbeing of a School employee or contracted worker should additionally be reported to the human resources department: hr@fairfield.ac

Where there an immediate risk of harm or danger to life, the correct procedures is to phone 999 for the emergency services then alert security staff, the Principal and the Campus Designated Safeguarding Officer

1. Introduction

- 1.1. The Fairfield School of Business's ('FSB' or 'the School') Safeguarding Policy outlines the School's commitment and its statutory duty to protect and promote the wellbeing of all its staff, students, visitors, volunteers, consultants and agency staff and those that come into contact with a child or adult at risk as part of their work or activities.
- 1.2. The School's Safeguarding Policy aims to provide a safe environment for all vulnerable adults and children. This applies to all aspects of our work and everyone working for FSB. This policy outlines how to deal with safeguarding concerns while highlighting safeguarding principles, roles and responsibilities.
- 1.3. Primarily, this policy encourages a positive work and learning environment where students and staff are safeguarded against harm and abuse.
- 1.4. This policy is not restricted to the School's premises; it is extended to any individual that needs to report a risk or suspected risk of harm outside of the School's premises. Individuals can use the processes outlined in this policy to raise a concern in pursuance of offering the appropriate support.
- 1.5. This policy differs itself from the School's Health and Safety Policy and Security Policy, which deals with the immediate physical safety of individuals on the School's premises.

Safeguarding Children and Vulnerable Adults

- 1.6. FSB acknowledges its duty of care for all students and staff and accepts a duty to safeguard children and adults at risk against harm and abuse. Although, ultimately, the responsibility for children lies with those who have parental responsibility. Moreover, the School recognises its duty of care for staff and especially its teaching staff who may be subjected to false allegations of abuse or hostile behaviour.
- 1.7. The School is an inclusive and diverse institution that is committed to providing equal opportunities to its staff and students and within its recruitment processes. Where staff comes into contact with vulnerable adults (someone who is unable to take care of themselves or unable to protect themselves from exploitation or abuse), the School provides a safe environment for vulnerable adults and provides reasonable adjustments to accommodate their specific needs.
- 1.8. While the School only offers learning opportunities to persons of 18 and over and while students are not permitted to bring children to the campus, it is established that staff may come into contact with children on campus. In accordance to 1.6., children will need to be supervised by their legal guardian at all times whilst on School premises. Please seek advice from the Designated Safeguarding Officer immediately if someone is concerned about the wellbeing of a child.

Raising Concerns about an Individual's Mental Health

- 1.9. FSB promotes a culture where individuals are encouraged to seek help when a mental health issue arises. FSB is accepting and understanding of the fact that mental health issues can impair a student's academic performance and an employee's work performance.
- 1.10. The procedures for raising and responding to concerns within this policy extend to individuals suffering from a mental health issue, or those who are concerned about the mental wellbeing of another.
- 1.11. The School's Prevent Duty Policy indicates how the institution implements the Duty requirements across its facilities.
- 1.12. This policy administers the responsibilities for HE/FE providers which are set out in the Counter Terrorism and Security Act 2015 to safeguard our students, staff, agency staff, consultants, visitors and volunteers from the risk of radicalisation.

2. General Safeguarding Principles

- 2.1. FSB will ensure that:
 - i. The safety and wellbeing of our students, staff, agency staff, consultants, visitors and volunteers is of the utmost importance,
 - ii. The School's procedures are clear and accessible for anyone to report a safeguarding concern,
 - iii. Training of safeguarding and Prevent Duty themes are made available to all staff where it is appropriate to their role within the School. Staff will know how to respond in the event a disclosure of abuse is made to them,
 - iv. Clear guidance on safely sharing information about individuals a risk is given to staff,
 - v. All safeguarding concerns reported are taken seriously and dealt with urgently,
 - vi. Criminal record checks with the Disclosure and Barring Service and other procedures are in place to check the suitability of all staff and students who come into contact with children or vulnerable adults,
 - vii. Where any members of staff and students are in contact with children or vulnerable adults, risk assessed action plans have been put in place to protect individuals at risk,
 - viii. The student selection process is in compliance with the duty to safeguard children and vulnerable adults.

3. Safeguarding Roles and Responsibilities

- 3.1. Any suspicions that an individual may be at risk of harm should be reported immediately by all staff and students to their Designated Safeguarding Officer (DSO), and in accordance with FSB's Information Sharing Procedures (See Appendix C). If the DSO is unavailable, contact the Designated Safeguarding Lead (DSL) with your concern(s) – contact information is on page 1.
- 3.2. A male and female DSO has been appointed to each campus, to whom they report safeguarding concerns to a Designated Safeguarding Lead (DSL). The DSL provides support and guidance in the event and engages the person concerned, if appropriate.
- 3.3. The School's Safeguarding and Prevent Governor is the CEO; they will advise the School's Executive Committee in regards to mitigating risks, policies and procedures with safeguarding and the Prevent Duty and they are responsible for the safety and wellbeing of all students, staff, volunteers, visitors and consultants
- 3.4. The development of policies, training, procedures and the School's activities regarding FSB's Safeguarding principles are accountable to the Executive Committee (EC) when liaising with safeguarding and Prevent Duty stakeholders. The EC will provide:
 - Oversight and maintenance of institutional safeguarding;
 - All staff members the knowledge and training required to handle safeguarding concerns, how to spot individuals at risk and the clarity and awareness on how to uphold this policy;
 - Record-keeping of all safeguarding incidents to inform and review our practices since the School has adopted a lessons learnt approach;
 - Appropriate referrals to external support agencies and prevent partners are made in a timely fashion.
- 3.5. FSB has appointed a Designated Safeguarding Lead (DSL), who ensures a male and female Designated Safeguarding Officer (DSO) is placed in each campus and oversees the implementation of this policy whilst sharing safeguarding protocols and information.
- 3.6. The DSL commits to:
 - Raising awareness of all safeguarding issues and changes to this policy with all staff and students;
 - Maintaining and securing a record of all cases, referrals and concerns and offering feedback to disclosers, where appropriate;
 - Liaising with Prevent Duty stakeholders and external agencies on safeguarding matters;
 - Making assessments about the level of risk to an individual's wellbeing and preparing a report for senior safeguarding stakeholders on all cases.

NB: The DSL may also act as the Designated Prevent Lead (DPL).

- 3.7. The Human Resources Team is in charge of:
- Administering background checks on all prospective employees, which may include DBS checks where appropriate;
 - Safeguarding and prevent duty training for all staff and keeping records of all completed training;
 - Distributing ID badges to all new employees, visitors and contractors and ensuring that badges are returned to HR when employment has concluded;
 - Making suitable arrangements to protect staff members from false or unproven allegations of abuse;
 - Making referrals as appropriate for occupational health-related matters;
 - Supervising investigations of staff misconduct which are related to safeguarding concerns and deciding whether the employee should be suspended if found responsible.
- 3.8. Line Managers and Course Leaders share the duty of care, both employees should be attentive to anything that may give rise to concerns over an individual's wellbeing. Line Managers should make sure that their staff is supported professionally and emotionally and that working practices and environment does not put staff members at risk. While, Course Leaders must have oversight of interactions between the teaching staff and students, notably where staff comes into contact with vulnerable adults and children.
- 3.9. Investigations into instances of student misconduct regarding safeguarding concern, Course Leaders may supervise the investigation and decide if the student should be suspended
- 3.10. In terms of safeguarding, the IT Department is responsible over internet access via School IT networks by restricting access to harmful web content with the operation of reputable web filters. More information can be found in the School's IT Security Policy.
- 3.11. Access to campus buildings are managed by Security and Reception staff. They will handle this by checking ID badges and responding to any security incidents.
- 3.12. The responsibility over campus buildings being equipped with security and reception staff, CCTV, alarms, accessibility features and communication equipment is managed by the Operations and Maintenance team.
- 3.13. The arrangement of external speaker visits or off-campus events are underlined in the School's External Speakers and Events Policy.

4. Reporting a Concern

Where there an immediate risk of harm or danger to life, the correct procedures is to phone 999 for the emergency services then alert security staff, the Principal and the Campus Designated Safeguarding Officer (See page 1).

- 4.1. The campus' Designated Safeguarding Officer (DSO) should be approached immediately if there are any concerns over an individual's wellbeing. If the DSO is unavailable or there is a conflict of interest, the disclosure must be directed to the Designated Safeguarding Lead (see contacts on page 1).
- 4.2. If approaching the person directly before contacting the DSO, it is beneficial to find out as much information before a disclosure is made and acquire consent from the individual to share sensitive information about them.
- 4.3. If a disclosure is made to a member of staff, they should always take the disclosure seriously, listen carefully and keep notes and records confidential, remain patient and calm when discussing the disclosure, gain as much information and trust as possible to receive consent from the individuals in hopes of referring the matter to the DSO.
- 4.4. Confidentiality should never be offered as this may not be in the discloser's interests and the person receiving the disclosure may have to fulfil a duty to pass on information they receive concerning someone's safety or any potentially criminal activity.
- 4.5. If a person has difficulty approaching the individual at risk or does not have their consent to share information about them, a DSO can be approached and information can be shared with the respective DSO on the basis that it may be harmful not to.
- 4.6. If in doubt, Appendix C displays an information sharing procedure.

NB: If the issue requires urgent attention and is a health and safety matter, the building's Office Manager or Health and Safety Representative should be notified immediately. Such issues include but are not limited to: slip/ fall or other environmental hazards, unguarded entrances, damaged or missing safety equipment, unaccompanied children, unrestricted access to unsafe areas, hygiene issues.

5. Procedural Approach

- 5.1. Once a disclosure has be placed, the DSO will gather as much details and information about the issue and develop an initial assessment to present to the Principal and the Designated Safeguarding Lead (DSL). If the issue affects a staff member, a senior HR officer will be involved.

- 5.2. The Principal and the DSL will examine the case together to determine the most appropriate method of supporting the individual at risk; this may mean a form of internal support, or it the School might refer the individual to an external support organization.
- 5.3. The initial risk assessment may incite a formal investigation on the issue, if the issue is perceived as a risk that could affect others.
- 5.4. The DSL will organise and liaise with any external third parties in regards to supporting the individual(s) and offering feedback to the discloser.
- 5.5. FSB reserves the right to take steps under the School's disciplinary procedures if its standards of conduct may have been breached. FSB has a duty under the Safeguarding Vulnerable Groups Act 2006 to report staff or students who are dismissed as a result of safeguarding concerns to the Disclosure and Barring Service, as well as any relevant authority or professional body.

6. Records

- 6.1. All records, suspected or actual safeguarding concerns, will be kept safe by the respective DSL. These records are confidential and only accessible by the DSO. Records may be disclosed to other agencies if it is in the best interest to the individual at risk, then the case will be carefully disclosed with the School's information sharing procedure (See Appendix C).
- 6.2. FSB stores a single record of all staff who are in roles that have contact or potential contact with vulnerable persons that include employees or volunteers, the date and outcome of disclosure(s) made in relation to each individual.
- 6.3. All safeguarding concerns recorded will be saved in accordance with the School's data retention policies and procedures. Such records are saved separately from a student or staff member's personal records.

7. Training and Support

- 7.1. All staff will receive an induction, training and briefing appropriate to the nature of their safeguarding roles within the School. Whereas, the Safeguarding and Prevent Duty training activities will be conducted by the Human Resources Team and these training activities will be determined for each role by the Executive Committee in accordance with all applicable laws and statutes.
- 7.2. Training specific to Prevent Duty will be required by all staff; this training will include an assessment for which staff must prove a basic understanding of the Prevent themes.

- 7.3. Refresher training will be provided to staff every 3 years.
- 7.4. Staff and students will attain access to reference materials pertinent to their safeguarding duties, identifying risks and signs of abuse and information sharing. Furthermore, staff and students with questions about the School's provisions for its safeguarding measures or Prevent duty, may contact the Designated Safeguarding Lead for advice.

8. Safe Recruitment of Staff

- 8.1. All new staff arriving to work regularly with vulnerable adults are first subject to Disclosure and Barring Scheme procedures under the Safeguarding Vulnerable Groups Act 2006 and must be registered with the Independent Safeguarding Authority. Individuals on the Disclosure and Barring Services' barred list will not be able to attain employment at the School in any capacity when engaging with children or vulnerable individuals.
- 8.2. 8.2. Disclosure checks are necessary but are not thorough and can soon expire therefore, existing staff will register with the Disclosure and Barring Service when required by the law. References and identity checks will be obtained from new employees whilst risk assessments and performance reviews may also be carried out by the Human Resources Team.
- 8.3. If a staff member or student is found to be involved in misconduct with vulnerable individuals or children, they may be prosecuted and may be subjected to internal disciplinary proceedings. The School will have a duty of share information with the Disclosure and Barring Service or any other agencies, if they have found misconduct has occurred.

9. Monitoring, Evaluation and Review

- 9.1. The Designated Safeguarding Lead will keep a record of all safeguarding incidents and concerns, then the Lead will report these issues in an anonymised report to the Executive Committee on a yearly basis. These reports will remain confidential and if any issues or patterns of abuse surface, these will be dealt with accordingly.
- 9.2. A 'lessons learned' approach will be used to drive policy development and risk assessment with regards to reporting.
- 9.3. This policy will be reviewed and updated periodically by the Executive Committee with the consultation of our safeguarding and Prevent stakeholders whilst the School's Board of Governors reviews and ratifies the proposed changes.

The Prevent Duty

The School has a duty under the *Counter Terrorism and Security Act 2015* to have due regard to prevent people of all ages being radicalised or drawn into terrorism.

- **‘Extremism’** refers to expression of views which may deny rights to any group or individual and can be manifested as racism, homophobia, far right- or left-wing ideology and any religious extremism. The Counter Terrorism and Security Act 2015 defines extremism as the 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. It may also refer to calls for the death of members of the British armed forces.
- **‘Radicalisation’** refers the act or process of making a person more favouring of extreme or fundamental changes in political, economic or social conditions, institutions or habits of the mind. Some young people and adults at risk of harm may be vulnerable to radicalisation or being coerced into adopting extreme views of any sort, be they political, religious, economic or environmental, etc.
- **‘Terrorism’** is a threat or physical act of violence for the purpose of advancing a political, religious, racial or ideological cause.



Version Tracking:

Version	Author / revisions by	Changes summary	Approved by	Date
1.0 – 4.2	Principal Designated Safeguarding Lead	Original version for submission to the Board of Governors	Executive Committee	Sep 2017 Jan 2018 Sep 2018
5.0 – 5.1	Quality Audit Manager Designated Safeguarding Lead (DSL)	General revision of document and procedural approach and contact information; title redacted to 'Safeguarding Policy'; addition Prevent Duty themes.	Board of Governors	Sep 2019
5.2	Quality Audit Manager Head of Student Support	Updates to content to include mental health concerns within scope of reporting procedures	Board of Governors	Aug 2020
6.0	Quality Officer Head of Student Support	Annual review and update, DSL contact information updated	Board of Governors	Jan 2022