



Fairfield School of Business

info@fairfield.ac

# Student Safeguarding Policy

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## Abstract:

FSB is committed to ensuring a safe and supportive environment for students. This policy and appended guidance sets out how to recognise and respond when somebody may be at risk of harm, and who is responsible for taking action.

## Related Policies:

- *Student Support Policy*
- *Student Code of Conduct and Disciplinary Procedures*
- *Fitness to Study Policy*
- *Personal Relationships at Work Policy*

## Applicability:

This policy applies to all safeguarding concerns about **students** of FSB and extends to risks of harm that may exist off-campus; if someone has a concern about the wellbeing of a member of FSB staff, they should contact the HR team ([HR@fairfield.ac](mailto:HR@fairfield.ac))

**If you are unsure about what to do, please refer to [Framework](#) for Responding to a Student Safeguarding Concern**

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## 1. Introduction

### 1.1. Policy Aims

This policy supports Fairfield School of Business's (FSB) aim to develop a positive culture and learning environment where all students and staff are protected from harm or abuse by:

- i. affirming FSB's commitment to student and staff safety and wellbeing.
- ii. providing a clear framework for all members of the FSB community to understand their safeguarding roles and responsibilities.
- iii. setting out a clear process to follow when raising and dealing with safeguarding concerns.
- iv. ensuring a consistent and effective response that complies with all relevant UK legislation and regulatory requirements.
- v. outlining the FSB's safer recruitment process and commitment to training.

### 1.2. Scope

This policy applies to the safeguarding of all FSB students, and therefore applies to all those who may encounter FSB's students such as staff, visitors, volunteers, and contractors of FSB. Its scope extends to risks of harm that may exist off-campus and focuses on the response to **immediate, urgent, or significant risks** to a student's safety and welfare.

Student Safeguarding is therefore distinct from the ongoing, routine support provided by other services such as Student Support and Welfare, Personal Academic Tutoring, and Academic Support. While this policy governs the initial response, safeguarding disclosures may serve as the entry point to several other procedural pathways. Any subsequent investigations or formal support measures are managed under their respective policies, as detailed in Section 4.

Additionally, this policy is distinct from the School's Health and Safety Policy and Security Policy, which deal with the mitigation of risks to the immediate physical safety of persons on FSB's premises.

### 1.3. Legislative and Regulatory Framework

This policy is informed by and seeks to comply with key UK legislation and guidance, including but not limited to:

- *The Counter-Terrorism and Security Act 2015 (the Prevent Duty)*
- *The Office for Students (OfS) Conditions of Registration (specifically Condition E6 on Harassment and Sexual Misconduct)*
- *The Higher Education (Freedom of Speech) Act 2023*
- *The Safeguarding Vulnerable Groups Act 2006*
- *The Equality Act 2010*
- *Protection from Harassment Act 1997*
- *The Data Protection Act 2018 and UK GDPR*

#### 1.4. **Academic Freedom and Freedom of Speech**

Nothing in this policy should be taken as prohibiting or limiting FSB's commitment to Academic Freedom and Freedom of Speech. As an academic institution, FSB encourages research, teaching and healthy debate on topics related to safeguarding including mental health, harassment, sexual misconduct, radicalism and extremism as part of any relevant programme of study or research activity. Additionally, FSB recognises the need for full and frank discussion on its obligations with regards to safeguarding its students.

See FSB's [Academic Freedom Policy and Code of Conduct](#) for more information.

## 2. **Roles and Responsibilities**

While all members of the FSB community share a responsibility for safeguarding, the following roles and groups have specific duties:

### **Leadership and Governance:**

- **Board of Governors (BoG):** Responsible for approving policy and receiving annual reports on student safeguarding e.g. summaries of casework.
- **Executive Committee (EC):** Responsible for the strategic oversight of institutional safeguarding, ensuring policies are implemented, staff are trained, and referrals to external agencies are made appropriately.
- **Student Support and Welfare Committee:** The Student Support and Welfare Committee is the predominant body for the review of all student support and welfare. The Committee involves staff from all campuses and from different roles to

ensure that FSB has a holistic approach to its provision for students. The Student Support and Welfare Committee will receive regular updates from the Student Safeguarding Group.

#### **Student Safeguarding Group:**

Consists of the Student Life Cycle and Enhancement Manager, Student Welfare Adviser, the Designated Safeguarding Officer and may co-opt other members as necessary e.g. Operations and/or Admissions. Share best practice, review processes, provides training for Safeguarding Leads and identifies training opportunities for the rest of the staff and student body.

#### **Specialist Safeguarding Roles:**

- **Designated Safeguarding Lead (DSL):** The institutional Designated Safeguarding Lead (the Student Life Cycle and Enhancement Manager) oversees institutional policy to ensure compliance with regulation and legislation, that it reflects best practice in the sector, and that it is effectively implemented. Additionally, they lead a network of Designated Safeguarding Officers in the campuses, provide training, liaise with external agencies, oversees disclosures, and are responsible for reporting through FSB's governance system. The DSL also acts as the Designated Prevent Lead (DPL) (see Prevent Policy).
- **Designated Safeguarding Officers (DSOs):** Each campus has male and female Campus DSOs who are the first point of contact for concerns on that campus. They provide immediate support, and report concerns to the institution's DSL and the Campus Dean.

#### **Wider Community Roles:**

- **Student Support and Welfare Services:** Each campus has a Student Support and Welfare Services office which provides administrative, pastoral and welfare support to all students. Therefore, staff in SSWS and Personal Academic Tutors (See below) are likely to receive disclosures from students regarding safeguarding concerns, although it is noted that any staff may receive a disclosure.
- **Personal Academic Tutors:** Each student has a Personal Academic Tutor (PAT) who provides support for students for anything related to their academic studies or their pastoral care. Therefore, PATs are in a key position to receive safeguarding disclosures.
- **Human Resources (HR) Team:** Responsible for safe recruitment practices (including DBS checks), maintaining training records, managing staff disciplinary

procedures, managing staff safeguarding concerns, and protecting staff against false allegations.

- **Line Managers and Course Leaders:** Have a duty of care for their staff and students, ensuring working and learning practices are safe and supportive.
- **IT Services, Security, and Operations Teams (including Security):** Responsible for maintaining a safe physical and online environment through access control, CCTV, web filtering, and building security.

### 3. Key Safeguarding Areas

Safeguarding is our duty to protect the health, wellbeing, and human rights of students, enabling them to be safe from harm, abuse, and neglect. Our duty of care extends to off-campus activities and online environments. Safeguarding involves events that may have already happened, and/or anticipating events that are at risk of happening. The safeguarding concern might be reported by the student themselves, or by another student, or witnessed by a member of staff. The below are the key Safeguarding areas that are experienced at FSB.

#### 3.1. The Prevent Duty

FSB is committed to its statutory requirements under Prevent Duty to ensure students and staff are safe from the risk of radicalisation, which is the process by which a person comes to support terrorism and extremist ideologies. Our [Prevent Duty Policy](#) is available on our FSB Policies page. Our commitment to the prevention of radicalisation and extremism does not negate FSB's commitment to academic freedom and freedom of speech.

#### 3.2. Harassment and Sexual Misconduct

FSB's definitions for Harassment and Sexual Misconduct are informed by guidance from the Office for Students, the Protection from Harassment Act 1997, and the Equality Act 2010. The definitions extend to conduct between students and conduct that is online or in person. The below definitions and examples **are not intended to be an exhaustive list**. FSB will use objective measures when deciding if an act of harassment or sexual misconduct has occurred.

Note that FSB is not required to use a criminal standard of proof in its own internal investigations and any judgements reached as part of an investigation do not constitute a legal ruling on whether or not criminal activity has taken place.

FSB will provide support to students who report harassment and sexual misconduct regardless of whether FSB considers that the incident meets the definitions and objective tests.

### **Harassment:**

Harassment is any unwanted physical, verbal or non-verbal conduct that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them.

FSB will pay particular attention to where an alleged incident of harassment relates to one or more of the protected characteristics as per the Equality Act 2010, namely age, disability, gender reassignment, race, colour, nationality, ethnicity or national origin, religion or belief, sex or sexual orientation.

Specific examples of harassment may include:

- **Verbal:** Making offensive jokes, using slurs or nicknames, making derogatory comments about a person's background, religion, or identity.
- **Social:** Deliberately excluding someone from conversations or activities, spreading malicious rumours.
- **Written/Online:** Sending offensive emails or messages, posting discriminatory comments on social media, creating offensive memes or images.
- **Intrusive:** Asking intrusive questions about a person's private life, identity, or medical history.

### **Sexual Misconduct:**

Sexual Misconduct is a broad term for any unwelcome behaviour of a sexual nature. It exists on a spectrum, from inappropriate comments to serious criminal offences. It is the unwanted nature of the behaviour that matters, not the intention behind it. Sexual misconduct includes, but is not limited to sexual harassment, sexual assault and rape.

Specific examples of sexual misconduct may include:

- **Verbal:** Catcalling, making unwelcome comments about a person's body or appearance, telling sexually explicit jokes, repeatedly asking someone for a date after being refused, making intrusive remarks about a person's sex life.
- **Non-Verbal:** Leering or staring in a sexually suggestive way, making sexual gestures, displaying sexually explicit images or materials.



- **Physical:** Unwanted touching, hugging, or kissing; invading someone's personal space; blocking their path; sexual assault and rape.
- **Online/Digital (Cyber-harassment):** Sending unwanted sexually explicit messages or images ("cyber-flashing"), sharing private sexual images of someone without their consent, stalking someone on social media.

Sexual misconduct is complex and may not always be obvious or follow an easily recognisable pattern. It is important to note that:

- a person can experience unwanted conduct from someone of any gender.
- conduct may be unwanted even if the person subject to it does not expressly object to it.
- sexual conduct that has been welcomed in the past can become unwanted.
- FSB has a dedicated website which provides a “Comprehensive Source of Information” for all policies and guidance on harassment and sexual misconduct.

Note that when an allegation of harassment or sexual misconduct has been made between students, or between a member of staff and a student, the matter will be investigated as per the student Code of Conduct and Disciplinary Procedures and/or the staff **Disciplinary Policy and Procedure**.

See Appendix 1 for more information on Harassment and Sexual Misconduct

### 3.3. **Safeguarding Children and Vulnerable Adults**

While FSB is a provider for those aged 18+, we recognise our duty of care to any children and any vulnerable adults at risk (someone less able to protect themselves from harm or exploitation), that we come to understand are at risk of harm. This may include:

- Children and vulnerable adults that are not being supervised
- Children and vulnerable adults that are being abused, or are at risk of being abused
- Where human trafficking is suspected

### 3.4. **Health, Mental Health and Wellbeing**

FSB understands that a mental health issue can seriously impair academic performance and an individual's quality of life. We promote a culture where individuals are encouraged to seek help. Students can seek help with any health, disability or mental health concern at any time as per our Student Support Policy.

The Student Safeguarding Policy comes into effect where there is an immediate, urgent, or significant concern to the students' health, mental health or wellbeing. This may include where the student has self-harmed, or has made comments about self-harming or committing suicide, or is displaying unusual behaviour. See Appendix 2 for more information on recognising mental health concerns in students.

### **3.5. Student Welfare**

There are many other risks related to the student's welfare that may be disclosed as a safeguarding concern. Staff should use exercise their professional judgement to determine if something that has been disclosed to them should be reported under the Student Safeguarding Policy, noting that safeguarding refers to when there is an immediate or urgent risk of harm to the student.

Where an immediate risk is not present, then the student can be supported through the Student Support and Welfare Services. Some examples of issues that students may face, that may or may not be considered a safeguarding concern based on the severity and immediacy include, homelessness, financial hardship, domestic abuse, self-neglect, other circumstances that may make a student vulnerable to harm, or where they have been a victim of crime. See Appendix 3 for further information on Types of Abuse and Spotting the Signs.

### **3.6. Drugs and Alcohol**

Drugs and alcohol are taken by many people without it necessary being a safeguarding concern. Drug and alcohol use can become a safeguarding matter if:

- There is a sudden or drastic increase in use
- The student(s) are or under the influence drugs and/or alcohol on campus
- The student(s) is known to be driving whilst under the influence of drugs and/or alcohol
- The drug and/or alcohol use is considered to be having a significant effect on the student's studies
- The student(s) is demonstrating unusual, intimidating, or threatening behaviour
- The student discloses that they are concerned about their level of drug and alcohol use

Note that all of our campuses are drug and alcohol-free zones and any student who bring drugs or alcohol onto campus will be considered under the FSB [Code of Conduct and Disciplinary Procedures](#).

### **3.7. Safeguarding the FSB and Wider Community**

The above examples relate to where there is a safeguarding concern for an individual or group of individuals. However, safeguarding at FSB extends to its entire community of staff and students. Therefore, action may need to be taken where it is considered that an

individual student, or group of students, represent a risk to the rest of the population. This may include:

- Violence, including attempts or threats
- Bringing weapons onto campus
- Bringing drugs or other dangerous substances onto campus (regardless as to whether or not this was in attempt to give or sell to another student)
- Where FSB becomes aware of a previous undisclosed criminal record
- Behaviour that the individual considers to be “normal”, but is threatening, disruptive, or alarming to others.

### 3.8. **Intimate Personal Relationships between Students and Staff**

FSB recognises that its staff, including academic and professional services staff are in a position of trust and it is important that they demonstrate exemplary behaviour. They should always give due consideration to appropriate environments and conduct. FSB aims to protect staff and students from allegations of actual or perceived conflicts of interest, and to limit circumstances where a position of power may be abused.

Given that intimate personal relationships between students and staff are prone to actual or perceived abuse of power and puts staff at risk of allegations of improper conduct, all personal relationships between staff and students are prohibited. The only exceptions to this are:

- Personal relationships that existed prior to the date this policy came into effect (1st August 2025) and that remains in existence; or
- existed before the date that the staff member became a relevant staff member in relation to that student.

FSB’s [Personal Relationships at Work Policy](#) provides further details on FSB’s position regarding intimate personal relationships between staff and students.

## 4. **Procedures for Disclosing, Responding to, and Reporting Concerns**

It is vital that any member of the FSB community who receives a safeguarding disclosure responds in a calm, considered, and appropriate manner. This section outlines the procedures for disclosing, responding to, and reporting all safeguarding concerns. **The campus Designated Safeguarding Officer (DSO) must be informed of all disclosures.** They will then report to the institution’s Designated Safeguarding Lead (DSL) and the Campus Dean. [Framework](#) for Responding to a Student Safeguarding Concern for a summary of the response to be made by the person to whom the disclosure is made), escalating the concern, and potential external referrals to be made.

#### 4.1. Immediate Risk to Life or Serious Harm

All disclosures where there is a grave or immediate risk to life or serious harm should be made in person. The person who receives the disclosure should immediately contact the Emergency Services through calling 999. Then, alert security staff, the Campus Dean, the Designated Safeguarding Officer, and the Designated Safeguarding Lead.

Disclosures with immediate risk to life or serious harm include:

- Where a student has threatened to seriously harm themselves or end their life
- Where a student has threatened to seriously harm or kill someone else
- Where a student has made a credible threat of a terrorist attack to be committed by themselves or someone else
- Where the threat to life or serious harm involves a child or minor (under 18)

**Note:** If a student discloses a risk to their life from abuse (e.g., domestic abuse), the immediate priority is their safety. While police involvement can have complex consequences and should ideally be with the student's consent, **this does not override the duty to contact emergency services if you believe there is a genuine and immediate risk to life or of serious harm.** In situations where the risk is not immediate, you should always discuss the next steps with the Designated Safeguarding Lead before contacting external agencies without consent.

#### 4.2. Making a Disclosure - Non-Immediate Risk to Life or Serious Harm

##### **Initial Disclosure - in person:**

Students may disclose a safeguarding concern, relating to themselves or someone else, to **any member of staff whom they feel comfortable talking to.** However, students are encouraged to disclose to those who have specialist knowledge and experience in supporting students with safeguarding concerns, namely:

- The Designated Safeguarding Officer in the campus
- Their Personal Academic Tutor
- Student Support and Welfare Services

Students may also ask to speak to the institution's Designated Safeguarding Lead.

##### **Initial Disclosure - FSBs Safeguarding Disclosure Portal:**

Students may disclose in person, or through FSB's Safeguarding Disclosure Portal, which may or may not be anonymous. If a report is made anonymously, FSB will do its best to investigate but may be limited without key testimony from the person making the disclosure. All disclosures made through the portal will be processed by the institution's Designated Safeguarding Lead in the first instance.

### **Initial Disclosure: - Student Complaints Form:**

FSB's Safeguarding Policy should be considered alongside the **Student Complaints Policy** and **Code of Conduct** when an issue is raised involving another student or a member of staff. Staff managing a complaint must consider the welfare of all parties and determine if a safeguarding referral is required. The immediate welfare and safety of those involved will always take precedence over investigatory procedures.

A student may also raise a complaint if they consider that the Student Safeguarding Policy and procedures were not followed appropriately.

### **4.3. Responding to a Disclosure – Principles**

FSB recognises that disclosures may be of a sensitive nature. Therefore, if a safeguarding concern is disclosed then we will:

- **Treat the disclosure seriously.**
- **Listen carefully to what is disclosed.**
- **Make accurate records of what is disclosed.**
- **Remain calm and not express shock, surprise, or disbelief.**
- **Try to gain as much information as possible but avoid interrogating the discloser.**
- **Discuss appropriate follow-up action.**

Explain the next steps and seek the individual's consent to refer the matter to the Designated Safeguarding Officer.

### **4.4. Responding to a Disclosure - Sharing Student Information**

FSB will treat all disclosures sensitively and will only share information where necessary and to those who need to be aware. We will always try to obtain consent to share any information that has been disclosed. However, there may be times where we have to take action even if we do not have explicit consent. For example: if we believe that there is a risk to life or serious harm; a serious crime has been, or could be committed; or someone has been, or they are at risk of being, radicalised or being drawn into extremist groups or terror organisations.

Action may include sharing the information with other relevant staff, speaking to other students involved, or reporting/liasing with external agencies. FSB will always aim to discuss this with the person making the disclosure first.

**Note:** In sensitive cases such as domestic abuse, it is crucial to proceed with the student's consent where possible, as police involvement can have unintended consequences. However, this principle does not prevent FSB from taking action without consent where there is a legitimate concern of an **immediate risk to the life or safety of any person, particularly a child or vulnerable adult.**

#### 4.5. **Responding to a Disclosure - Escalation and Record keeping**

The Designated Safeguarding Officer (DSO) in the campus must be informed of all disclosures. If a student does not consent to a direct referral, the DSO will provide advice and support to the staff member who received the disclosure. The staff member and the DSO will complete the “Student Safeguarding Disclosure Record” with a factual account of the discussion and agreed actions. The DSO will maintain a log of all disclosures on their campus and inform the institution’s DSL and the Campus Dean of all cases.

The DSO will provide regular updates to the institution’s DSL, especially for reporting purposes (See Governance below).

Note that escalation and report keeping should align with paragraph 4.4. on Sharing Student Information.

#### 4.6. **Responding to a Disclosure - Action to Take and Internal Support Available**

The response to the Safeguarding concern will vary depending on the nature of the concern, the people involved, and its immediacy. See [Responding to a Safeguarding Concern: A Framework for Action](#) for more detail on the appropriate response to be made. Note that action taken should align with paragraph 4.4. on sharing student information.

The potential action and/or support to be provided could consist of:

- Contacting emergency services where there is threat to life.
- Supporting the student in contacting the police where there is a fear for life or a crime has been committed.
- Assessing the immediate safety of the student either on campus, in their home environment, or for their plans for the journey to their home.
- Allowing the student to access a quiet space on campus or to go outside for space/fresh air if they are feeling overwhelmed or fearful.
- Assessing risk to any children/minors (under 18) or vulnerable adults in the student’s care.
- Referring the student to the Student Support and Welfare Services for general support regarding any pastoral or welfare concerns.
- Supporting the student with making an allegation against another student, a staff member, or a complaint against FSB.
- Seeking advice from regional Prevent Coordinators from the Department for Education and/or make a formal Channel Referral (see [Prevent Duty Policy](#)).

- Supporting the student to access any additional academic support they require if the safeguarding concern has impacted the student's studies, such as through their lectures, Personal Academic Tutors, or Academic Support.
- Supporting the student to seek advice on claiming Extenuating/Mitigating Circumstances (pending the individual policies from the awarding partners) if the safeguarding concern has affected the student's ability to complete any coursework assessments or prepare for a timed assessment (e.g an exam).

**Note that support should be made for students:**

- If they have experienced harassment or sexual misconduct.
- Through any allegation or complaints process.
- If they are actual or alleged perpetrators.

The support should be tailored towards the student's needs, and this may mean taking into account any protected characteristics. The support provided should continue through any investigatory and decision-making process.

#### **4.7. Responding to a Disclosure - External Referrals**

In some instances, it may be necessary to contact an external organisation, depending on the nature of the disclosure. Note that external referrals should align with paragraph 4.4. on Sharing Student Information.

As above, if there is an immediate risk to life, or serious harm, the emergency services should be contacted by call in 999.

If there is an urgent mental health concern that is not an emergency, NHS services can be contacted by dialling 111 and selecting option 2 for the mental health crisis line.

Where a crime has been committed, students should be supported, but not forced, to contact the police to make a report.

For disclosures of sexual assault, abuse, or misconduct, students may be referred to the Sexual Assault Referral Centre (SARC).

For concerns about radicalisation and extremism, a referral may be made to the DfE Regional Provider, or to Channel. Consent should be received first, but there may be times where we have to contact DfE or Channel without consent.

FSB can support students to reach out to local councils and/or housing provision in their local area where the student is, or is at risk of becoming, homeless.

FSB can recommend to students a number of external charities and organisations to support various concerns such as Mind, Samaritans, Women's Aid, and Frank.

See the [Framework](#) for Responding to a Student Safeguarding Concern for more details on potential external referrals.

#### **4.8. Responding to a Disclosure - Follow-up meetings**

The Student Safeguarding Policy primarily deals with issues that are immediate, urgent, or significant and therefore are very time sensitive. However, it is vital that support for students continues beyond the initial disclosure. The Designated Safeguarding Officer should ensure that follow-up meetings are arranged at an appropriate point to continue to monitor risk, offer support, and inform the student of any action taken. The outcomes should be recorded on the Student Safeguarding Meeting template and summarised in the Student Safeguarding log.

#### **4.9. Responding to a Disclosure - Related Policies and Procedures**

A disclosure made under this Safeguarding Policy may lead to formal action under other institutional policies. The appropriate pathway is determined by the nature of the concern, for example:

Where another student has been accused of committing harassment or sexual misconduct, this will be investigated as per the [FSB Code of Conduct and Disciplinary Procedures](#)).

Where a staff member has been accused of harassment or sexual misconduct this will be investigated as per the FSB staff Discipline Policy and Procedures.

Where there is a concern about a student's fitness to continue with their studies, the [Fit to Study Policy](#) should be followed.

### **5. Safe Recruitment, Training and Support**

FSB is committed to safe recruitment practices, including DBS checks for relevant roles. All staff receive safeguarding training upon induction and must complete refresher training every two years. The HR team monitors completion. Additionally, safeguarding training is a standard part of the biannual Staff Development Day for all staff.

Staff with specific duties for Student Safeguarding will receive additional training appropriate for their role. The institution's Designated Safeguarding Lead, will lead the Student Safeguarding Group and will meet at least 4 times per year. This will provide a forum for sharing best practice, and updates to guidance, and identify further training opportunities (see below).

Training for all students will be provided as part of the compulsory induction process and reinforcement/refresher training will be provided annually.

All training will include reference to the FSB Harassment and Sexual Misconduct website (Comprehensive Source of Information) and disclosure and reporting procedures.

All training sessions will include anonymous methods for receiving feedback on effectiveness.



## **6. Governance**

### **6.1. Student Safeguarding Group**

The institution's Designated Safeguarding Lead will chair the Student Safeguarding Group consisting of the Designated Safeguarding Officers and will meet at least 4 times per year. The Group may also co-opt other members such as Admissions and/or Operational/Security staff as appropriate. The aim of the Group is to:

- Reinforce training on policy
- Share best practice and any newly published guidance
- Consider if any further training for the Safeguarding Officers is necessary
- Consider if any further training for FSB staff or students is required
- Review student induction materials on Safeguarding (including Prevent, Harassment, and Sexual Misconduct)
- Discuss any general issues and concerns (not specific student cases)

### **6.2. Reporting to the Student Support and Welfare Committee**

The Student Support and Welfare Committee is the predominant body for the review of all student support and welfare. The Committee involves staff from all campuses and from different roles to ensure that FSB has a holistic approach to its provision for students. The Student Support and Welfare Committee will receive regular updates from the Student Safeguarding Group.

### **6.3. Reporting to the Academic Board**

The Student Support and Welfare Committee reports to the Academic Board and provides regular updates on SSWC Committee business and on anything else that may impact on the students' academic studies.

### **6.4. Reporting to the Executive Committee**

The Executive Committee has the responsibility for the implementation of the Student Safeguarding Policy and will review the Policy annually, with any changes ratified by the Board of Governors.

The Student Life Cycle and Enhancement Manager, in their role as institution Designated Safeguarding Lead, will provide regular updates to the Executive Committee. These will include:

Numbers of student cases and common themes

- Assurance on the effectiveness of training for staff and students

- Lessons learned and best practice
- Updates on any new legislation, regulation, or sector guidance
- Updates on human and physical resources

## **6.5. Reporting to the Board of Governors**

The institution's DSL will submit an anonymised annual report to the Board of Governors. This report will detail student cases, evaluate the effectiveness of FSB's procedures, and include any recommendations for policy updates for the Board's approval.

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## **Appendices**

**Appendix 1:** Harassment and Sexual Misconduct

**Appendix 2:** Recognising Mental Health Concerns in Students

**Appendix 3:** Types of Abuse and Spotting the Signs

## Appendix 1: Harassment and Sexual Misconduct

### Response to the Office for Students Condition E6: Harassment and Sexual Misconduct

The Office for Students Condition E6: Harassment and Sexual Misconduct came into play in August 2025 regarding the prevention of, and addressing incidents of harassment and sexual misconduct. This covers incidents of harassment and/or sexual misconduct which affect one or more students, including the conduct of staff towards students, and/or the conduct of students towards students.

FSB has responded accordingly, and part of the response included a re-write of the Student Safeguarding Policy, and the development of a webpage which provides a [Comprehensive Source of Information](#) on FSB policies and procedure for the prevention of, and addressing incidents of harassment and sexual misconduct, including an online reporting form. The [Comprehensive Source of Information](#) also provides FSB's position on intimate personal relationships between staff members and students. Additionally, FSB added a Student Safeguarding Group to its governance structure to provide oversight and training across its institutions.

FSB's response to the E6 Condition took into consideration that none of its policies or procedures should prohibit or limit academic freedom or freedom of speech principles as detailed in its [Academic Freedom Policy and Code of Practice](#). Additionally, FSB does not include any restricting provisions in any contract (e.g. Non-Disclosure Agreement) formed or varies after the date the condition took effect.

In implementing the updated policies and procedures in relation to Condition E6, FSB undertook a comprehensive communication and training plan to ensure that all staff and students were well informed of its duties including:

- up-to-date understanding of the content of the single comprehensive source of information;
- up-to-date understanding of behaviour that may constitute harassment and/or sexual misconduct
- up-to-date understanding of disclosure and response procedures, including the online reporting form;
- the support available to students who make a disclosure, or those that are alleged perpetrators

Additionally, staff with specific duties with regards to student safeguarding received further training on:

- escalation and reporting procedures
- investigation procedures

- making decisions in relation to incidents of harassment and/or sexual misconduct
- alignment with other FSB policies such as Fitness to Study and Student Complaints
- ensuring safety on campuses
- safeguarding for FSB applicants (for Admissions Staff)
- advocating for students (for Student Union staff)

## Definitions

FSB's definitions for Harassment and Sexual Misconduct are detailed in **Section 3.2** of this policy. This appendix provides further context and guidance on their application.

Where conduct does not fall squarely within the definitions of harassment and sexual misconduct as per the examples provided below, FSB may still consider that the conduct still amounts to harassment or sexual misconduct. The definitions and examples therefore includes the most serious behaviour of sexual assault and rape but this is not intended to be an exhaustive list.

In deciding whether conduct constitutes as harassment or sexual misconduct, FSB will take into account: the perception of the person who is at the receiving end of the conduct; the other circumstances of the case; and/or if a reasonable person in possession of the same information would think the conduct amounted to harassment/sexual misconduct of the other person. FSB considers that harassment and sexual misconduct may be a single event or a pattern of behaviour over time.

These last points are important because it introduces an element of objectivity into the test. These objective tests are of particular importance where FSB may face pressure from students or staff, or pressure from external groups, to curtail speech that is lawful but which is perceived as offensive towards a particular person or group of persons.

Note that FSB is not required to use a criminal standard of proof in its own internal investigations and any judgements reached as part of an investigation do not constitute a legal ruling on whether or not criminal activity has taken place.

FSB will provide support to students who report harassment and sexual misconduct regardless of whether FSB considers that the incident meets the definitions and objective tests.

Note that when students make a disclosure, they may not feel comfortable with using certain terms like “rape” or “assault”. The person receiving the disclosure should endeavour to mirror the language that the person making the disclosure is using.

## The Impact of Harassment and Sexual Misconduct

FSB recognises that that harassment and sexual misconduct can have a drastic impact on its victims and that each person’s reaction is unique to them. There is no 'right way' to react. Effects can be immediate or emerge over time. Some signs are more visible than others.

- Psychological and Emotional Impact:
- Feelings of fear, shame, embarrassment, or guilt.

- Anxiety, panic attacks, and depression.
- Loss of self-esteem and confidence.
- Difficulty trusting others and forming relationships.
- Post-Traumatic Stress Disorder (PTSD), which can include flashbacks and nightmares.
- Avoiding sex, or engaging in risky sexual behaviour
- Academic and Social Impact:
  - Difficulty concentrating, leading to a drop in academic performance.
  - Avoiding certain lectures, parts of campus, or social events.
  - Withdrawing from friends and support networks.
  - Missing deadlines or considering leaving their course entirely.
- Physical Impact:
  - Disrupted sleep patterns or insomnia.
  - Headaches, nausea, and other stress-related physical symptoms.
  - Changes in eating habits.

## Appendix 2: Recognising Mental Health Concerns in Students

FSB understands that positive mental health is fundamental to a student's wellbeing and academic success. It also recognises that many students will experience mental health difficulties or live with diagnosed mental health conditions during their time at university.

This annex affirms that having a mental health condition is not, in itself, a safeguarding concern. Many students effectively manage their conditions with support from healthcare professionals and FSB's welfare services. The purpose of this guidance is to help staff distinguish between manageable mental health conditions and situations where a student's mental state may be placing them, or others, at **risk of serious harm**, thereby becoming a safeguarding concern.

### Common Mental Health Conditions in Students

Staff are not expected to diagnose conditions, but a general awareness can help in understanding a student's experience. Common conditions include:

- **Anxiety Disorders:** Such as Generalised Anxiety Disorder (GAD), panic attacks, social anxiety, and phobias, which can cause overwhelming feelings of fear, worry, and physical symptoms like a racing heart.
- **Depressive Disorders:** Characterised by persistent low mood, loss of interest or pleasure, feelings of guilt or low self-worth, and disturbed sleep or appetite.
- **Eating Disorders:** Such as anorexia nervosa and bulimia nervosa, which involve an unhealthy preoccupation with food, weight, and body shape, leading to dangerous eating patterns.
- **Obsessive-Compulsive Disorder (OCD):** Involves intrusive, unwanted thoughts (obsessions) and repetitive behaviours or mental acts (compulsions) that a person feels driven to perform.
- **Post-Traumatic Stress Disorder (PTSD):** Can develop after experiencing a traumatic event and may involve flashbacks, nightmares, and severe anxiety.

FSB acknowledges that students with these and other conditions can, and do, study successfully. Support is available through Student Support and Welfare Services to help them manage their wellbeing throughout their studies.

### When Mental Health Becomes a Safeguarding Concern

A student's mental health becomes a safeguarding concern when it presents a **current or foreseeable risk of serious harm** to themselves or others, or when their ability to function and care for themselves deteriorates to a critical level.

This is not about judging the severity of a condition but about identifying behaviours and situations that indicate an acute crisis or an unmanageable level of risk.

### **Recognising Signs of Escalating Risk**

While many signs of mental ill-health are also listed here, a safeguarding concern should be considered when these signs are **severe, persistent, or represent a marked and worrying change from the student's usual behaviour**. Key indicators of an escalating safeguarding risk include:

#### **Significant Changes in Behaviour and Engagement:**

- A complete withdrawal from academic life, such as not attending any lectures, tutorials, or submitting any work for a prolonged period.
- Extreme social isolation; avoiding all contact with friends, family, and staff,
- Behaviour that is erratic, chaotic, or highly unpredictable and causes concern for the student's safety.

#### **Changes in Communication:**

- Expressing thoughts of hopelessness, worthlessness, or feeling like a burden to others.
- Directly or indirectly referencing suicide, death, or ending their life.
- Exhibiting paranoid or delusional thoughts that seem disconnected from reality.
- Making direct threats to harm others.

#### **Deterioration in Self-Care and Physical Appearance:**

- A rapid and significant change in weight (loss or gain).
- A marked decline in personal hygiene and appearance.
- Evidence or disclosure of self-harm (e.g., cutting, burning).
- Appearing intoxicated or under the influence of substances on campus during the day.

#### **Direct Disclosures of Crisis:**

- A student explicitly stating that they cannot keep themselves safe.
- A student disclosing that they have a plan to end their life.
- A student stating that they are afraid they will seriously harm someone else.

### **Action to be taken**

If a staff member observes one or more of these serious indicators, their role is not to diagnose the issue but to act on their concern. They must follow the procedures outlined in the main body of this Safeguarding Policy, which involves:

- **Responding appropriately** to any immediate disclosure,

- **Reporting the concern promptly** to the campus Designated Safeguarding Officer (DSO),
- **Following the escalation framework** outlined in the policy, particularly in situations involving an immediate risk to life where the emergency services must be contacted.



## Appendix 3: Types of Abuse and Spotting the Signs

Abuse is the mistreatment of a person, which either deliberately or unknowingly causes harm, threatens their life or violates their rights. Abuse can vary from treating someone with disrespect in a way which significantly affects the person's quality of life to causing actual physical suffering.

Recognising abuse is not easy and it is not the responsibility of School employees, volunteers or students to decide whether or not abuse has taken place or if an adult has been harmed or is at risk of harm. They do, however, have a responsibility to act if they have a concern about a person's welfare or safety or a disclosure of abuse has been made to them.

People may be reluctant to disclose abuse occurring to themselves or to others for any number of reasons, the most common reasons being embarrassment, social stigma or fear of reprisal. Sometimes people are simply not aware that what is being done to them is considered abuse and is wrong or they feel that for some reason they deserve it.

The signs of abuse in adults are varied, some forms of abuse may not be visible at all. The following details the type of abuse that may occur and some of the tell-tale signs that may accompany them.

Evidence of any one indicator from the following lists should not be taken on its own as proof that abuse is occurring. However, it should alert staff to make further assessments and to consider other associated factors. The lists of possible indicators and examples of behaviour are not exhaustive, and people may be subject to a number of abuse types at the same time.

**Physical abuse:** physical harm caused by hitting, slapping, pushing, kicking, biting, violently retraining, etc. Signs of physical abuse may include:

- Bruises
- broken or fractured bones
- burns or scalds
- bite marks
- scarring
- the effects of poisoning, such as vomiting, drowsiness or seizures
- breathing problems from suffocation or poisoning

Victims might try to conceal such injuries with clothing or accessories.

**Psychological or emotional abuse:** causing someone mental and emotional distress by using threats, humiliation, control, intimidation, harassment, verbal abuse or other forms of bullying behaviour. A person suffering psychological or emotional abuse might:

- suddenly change their behaviour
- develop low confidence or low self-assurance
- struggle to control their emotions
- show sudden weight loss or weight gain

- have difficulty making or maintaining relationships / friendships
- have extreme outbursts
- seem isolated and withdrawn
- struggle to be social
- suffer panic attacks or emotional breakdowns
- exhibit signs of depression
- show evidence of self-harm (usually cutting)

**Sexual abuse:** any behaviour of a sexual nature which is unwanted and takes place without consent or understanding including rape and sexual assault or simulated sexual acts. Victims of sexual abuse may exhibit some of the indicators associated with physical or psychological abuse. Additionally, they may:

- not want to be touched or be shy from physical contact
- be protective of their personal space
- be in apparent difficulty walking or sitting
- show uncharacteristic use of explicit or obscene language
- suddenly change in appearance
- become confrontational
- show fear or aversion towards a particular individual

**Financial or material abuse:** stealing or denying access to money or possessions. Indicators someone is being financially or materially abused may include:

- missing personal possessions
- having difficulty with finances
- appearing malnourished and/or dishevelled
- being overly protective of things they own
- begging and borrowing heavily
- resorting to petty theft
- low engagement / absence

**Neglect:** the ongoing failure to meet a person's basic needs which may arise from a disability and/or learning difficulty. Indicators of neglect may include:

- Evidence of pain or discomfort particularly associated with a physical injury of disability
- Being very hungry, thirsty or untidy
- deteriorating health

**Domestic Violence:** including psychological, physical, sexual, financial, emotional abuse and honour-based violence. Signs of domestic abuse may include any of the above characteristics.

**Genital mutilation:** medical procedures carried out on a person's genitals which have no medical benefit and are performed against their will. Such procedures are illegal in the UK and are performed without licence by persons who often have no formal medical training. Signs of genital mutilation in both men and women may be similar to some of those exhibited by victims of sexual abuse. Other indicators may include:

- prolonged absence from studies
- difficulty walking, standing or sitting
- facial expression indicating clear pain or discomfort
- appearing quiet, anxious or depressed
- asking for help – though they might not be explicit about the problem because they're scared or embarrassed

**Discriminatory abuse:** treating someone in a less favourable way and causing them harm due to their age, gender, sexuality, disability, ethnic origin, religion or any other particular characteristic that constitutes a protected characteristic under the *Equality Act 2010*.

People who suffer discriminatory abuse may naturally express anger, indignation, frustration or fear and anxiety. They may also become quiet and withdrawn and feel unconfident about addressing the matter for fear of reprisal.

It is important that the School provides an environment where people can feel confident about raising any concern without fear of being treated less favourably for having done so.

In addition to the above, staff at the School should be aware of the potential exploitation of persons. Exploitation is the action or fact of treating someone unfairly in order to benefit from them. There are many forms of exploitation including, but not limited to the prostitution of others or other forms of sexual exploitation, forced labour or service, slavery or practices similar to slavery, servitude (collectively 'Modern Slavery'). Exploitation may also take the form of radicalisation.

### **The Prevent Duty**

As outlined in **Section 3.1**, the School has a statutory duty to prevent people from being drawn into terrorism. Radicalisation is a key safeguarding risk. For full details on definitions and reporting procedures, please refer to the dedicated [FSB's Prevent Policy](#).

## Document governance

Document owner*	<b>Designated Safeguarding Lead</b>
Consulted parties**	Designated Prevent Lead; SSW Committee;
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\*Responsible for updates to this content.

\*\*To be consulted on updates to this content.

## Versions

Version no.	Description of Changes	Approved by	Date
1.0 – 4.2	Original version for submission to the Board of Governors	Executive Committee	Sep 2017 Jan 2018 Sep 2018
5.0 – 5.1	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	Updates to content to include mental health concerns within scope of reporting procedures	Board of Governors	Aug 2020
6.0	Annual review and update, DSL contact information updated	Board of Governors	Jan 2022
6.2	Contact information on page 1 updated	Board of Governors	Feb 2023
7.0	Policy re-write to reflect introduction of OfS E6 condition on Harassment and Sexual Misconduct  Clarification of Roles and Responsibilities  Introduction of the Student Safeguarding Group  More detail on:	Board of Governors	Oct 2025

	<ul style="list-style-type: none"> <li>• Roles and Responsibilities</li> <li>• Mental health and welfare issue</li> <li>• Making and responding to disclosures</li> <li>• Escalation and reporting.</li> <li>• Training, Governance, and monitoring</li> </ul> <p>Changes to appendices and formatting.</p>		
7.1	Changes to staff roles	Board of Governors	Jan 2026

