Student Safeguarding Policy

Document

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Version Control

Date	Version	Summary of changes	Approver
March 2019	2.1	• Template change, minor updates	Director of Learning and Teaching
February 2020	2020/01	• Minor updates to DBS procedure	Director of Learning and Teaching
January 2023	23_01	• Key contacts section moved • Reporting requirements updated including Safeguarding Panels • Whistleblowing details updated • Prevent, confidentiality and data protection added • Further guidance section enhanced	Navitas UPE Academic Board
July 2023	23_02	• Added Criminal records and DBS policy and process to documents section • Updated contacts to include Deputy Lead Safeguarding Officer. • Regulated activity definition redefined • Criminal record checks of staff updated to align new Criminal Record Policy • Layout and title changes throughout, Sections added (1 – 6) • Removal of redundant wording	Navitas UPE Academic Board
March 2024	24_01	• Updated Navitas UPE Lead Safeguarding Officer (LSO)	NUKH Governing Body
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		• Updated information on admissions, general safeguarding processes, roles and responsibilities • Added Donesafe software function and process • Added Staff Code of Practice mapped to Navitas UPE Values in Action	– Chair's Action
June 2026	26_01	• Full review of content and alignment to latest regulation	Navitas UPE Academic Board

Key Related Documents

Document Name	Location
Children Act 1989	Children Act 1989
Children Act 2004	Children Act 2004
Criminal Record Checking Procedure	Navitas UPE
Criminal Records Policy	Navitas UPE
DBS Check Guide	https://www.gov.uk/guidance/making-barring-referrals-to-the-dbs#referrals-for-automatic-barring-offences
Gov.uk	https://www.gov.uk/topic/schools-colleges-childrens-services/safeguarding-children
NSPCA	https://learning.nspcc.org.uk/safeguarding-child-protection
Rehabilitation of Offenders Act 1974	Rehabilitation of Offenders Act 1974
M01c Prevent	College Website, Policy HUB
Staff Disciplinary Procedure	Staff Intranet, Policy Hub
QS11 Student Disciplinary Policy	College Website, Policy HUB
Staff – Student Relationship Policy	Navitas UPE
QS07 Student Support	College Website, Policy HUB
Values in Action	Navitas UPE
Whipsli	Navitas UPE
Whistleblowing	Navitas UPE

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Acronyms

AEGIS	Association of Educational Guardians for International Students
CAS	Confirmation of Acceptance for Studies
CDP	College Director / Principal
DASS	Director of Academic Student Services
DBS	Disclosure and Barring Service
DSL	Designated Safeguarding Lead
DSO	Deputy Safeguarding Officer (UPE)
HMSR	Harassment & Sexual Misconduct Responder
HSMIO	Harassment & Sexual Misconduct Investigating Officer
LADO	Local Authority Designated Officer
LSO	Lead Safeguarding Officer (UPE)
MASS	Manager of Academic Student Services
SO	Safeguarding Officer
UPE	University Partnerships Europe

Section 1 – Introduction, Contacts and Responsibilities

Introduction

Navitas University Partnerships Europe (UPE) is committed to providing a safe and secure environment for all Navitas UPE students including those under eighteen (18) years and adults at risk. This policy outlines how the network of Navitas UPE Colleges seeks to deliver its social, ethical, and legal responsibilities to protect and safeguard all students to the highest possible standards.

Among the students admitted to Navitas UPE Colleges, some will be under 18 years of age at the point of enrolment. UKVI safeguarding checks must take place if the student is under 18 years of age at an offer and CAS stage, even if they turn 18 at enrolment. Navitas UPE, through its Colleges, has specific responsibilities towards those who are under 18 years of age, as they are classified as children under the UK Children Act 1989 (and the amended Children Act 2004). This policy outlines how Navitas UPE supports and safeguards domestic and international students who are under the age of 18 from offer and confirmation of acceptance of studies (CAS) stage through to enrolment.

Students under the age of 18 years are legally considered minors in many jurisdictions where Navitas UPE operates and in particular in the UK. As such each College formally recognises this and accepts a higher level of responsibility for their educational, social and welfare provision. This higher level of responsibility is extended to vulnerable adults aged 18 or over who may be unable to take care of themselves against significant harm or exploitation.

Navitas UPE does not however act in *loco parentis*[1] with the exception of cases of medical emergency or when a student is unable to make a decision for themselves and the next point of contact is unreachable and there is a need to act quickly. However, it should be noted that all students under 18 years of age are required to have a UK guardian who will act in loco parentis.

Adult Students at risk can be any person aged 18 or over, who has needs for care and support (whether or not the local authority is meeting any of those needs) and is experiencing, or is at risk of, abuse or neglect; and as a result of those care and support needs, is unable to protect themselves from abuse or neglect or the risk of it.

[1] The term loco parentis refers to a person who is caring for a child in the absence of the parent or guardian who has parental responsibility.

Key Contact Role and Responsibilities

Navitas UPE is scrupulous in its safeguarding responsibilities. Key stakeholders for safeguarding throughout the organisation are as follows:

- **College Designated Safeguarding Leads (DSL)**:

The College CDP or nominee is required to act as the DSL. The DSL has operational responsibility for safeguarding children and vulnerable adults within the College and ensuring the policy is always followed.

  - Reporting to all stakeholders regularly in DSL Forums about safeguarding matters and supporting any queries
  - Reporting to the resident borough's children's services department where an allegation involves a student, employee or research participant under the age of 18; or to the resident borough's adult social care department where an allegation involves an adult at risk
  - Monitoring, promoting and reviewing the policy, guidance documents and resources
  - Ensuring the dissemination of the policy to all College staff through forums, committees and stakeholder meetings
  - Acting as the first point of contact for safeguarding concerns and providing support
  - Reporting to the LADO (Local Authority Designated Officer) and seeking advice in situations where a safeguarding allegation is made against a member of staff
  - Providing support to, and dealing with any queries from, students or members of staff who have been accused of misconduct related to a safeguarding issue
  - Keeping records of all safeguarding referrals and outcomes in line with data protection principles and guidance

- **College Safeguarding Officer (SO)**:

The College DSL will discharge a number of duties to an appointed SO including the role holder being a point of referral for safeguarding concerns raised locally. The SO will also represent the College on the Designated Safeguarding Lead Forum and act as deputy in the absence of the DSL.

- **University Partner Safeguarding Team / Student Wellbeing Services**:

There are a range of services available within the University Partner for those who may wish to receive advice or support on safeguarding and related matters. The College works closely with the appropriate policies and regulations of the University Partner and may from time to time use the services and support of the University Partner where matters arise.

- **Navitas UPE Lead Safeguarding Officer (LSO) and Deputy Lead Safeguarding Officer (DLSO)**:

The LSO has overall accountability and strategic oversight for safeguarding children and vulnerable groups within the organisation. The LSO will delegate day to day responsibility to the CDP or College nominee who will act as Designated Safeguarding Lead (DSL). A DLSO will act as support to the LSO for all operational matters regarding safeguarding and act as LSO in their absence to support Navitas UPE in carrying out its safeguarding duties.

The LSO for Navitas UPE is the Executive General Manager, Navitas UPE:
Paul Cawley
paul.cawley@navitas.com / 07503908209

The DLSO for Navitas UPE is the Head of Education, Navitas UPE:
Claire Whiting
claire.whiting@navitas .com

- **Local Council Child Protection Contacts**:

Local Councils and/or local authorities ensure that children and vulnerable adults are safeguarded. They have specific duties to safeguard and promote the welfare of all children and vulnerable adults in their area. Local authorities have a duty to undertake enquiries if they believe a child or vulnerable adult has suffered or is likely to suffer harm. Every local authority must have a Local Authority Designated Officer (LADO). The LADO is responsible for co-ordinating the response to concerns of an individual who works with children who may have caused them or could cause them harm.

- **NSPCC Child Protection**:

The National Society for the Prevention of Cruelty to Children are the UK's leading children's charity specialising in child protection and dedicated to protecting children. They are the only UK children's charity with statutory powers, which means they can take action to safeguard children at risk of abuse.

NSPCC Child Protection Helpline:

0800 800 5000

- **Police**:

The emergency services in the UK are to be contacted if a child or vulnerable adult is in immediate danger. In all other circumstances (non-emergencies) or where guided the Police non-emergency number should be used.

Police:
999 - emergency only (immediate danger)
101 - non-emergency, 24/7

Navitas UPE Responsibilities

Navitas UPE has specific legal responsibilities to ensure that all students are safeguarded against the risk of harm and abuse.

Navitas UPE recognises that abuse or harm or the risk of abuse or harm to students may take many different forms and that individuals may have different perceptions of what constitutes harm or abuse. Navitas UPE regards harm or abuse as including any physical, sexual or emotional abuse, neglect, bullying, harassment, intimidation, threats or use of violence. Further guidance on the forms that harm or abuse might take place are listed in Annex A.

It is not the responsibility of Navitas UPE to investigate harm or abuse. However, there is a duty of care to act if there is cause for concern, to protect the welfare of all students, and to notify the appropriate regulatory agencies about any concerns so that they can investigate.

Navitas UPE will keep this Policy under review to ensure that all students are safeguarded, and that this Policy complies with developments in legislation, regulations and good practice. In line with the University Partner ethos, Navitas UPE Colleges will comply as closely as possible with policies and regulations of the University Partner.

Navitas UPE recognises that it has a duty to help staff and students through guidance, support and training in order to promote safe working practices to minimise risks to under 18s and vulnerable adults. This duty extends to keeping these categories of students safe from the risk of Modern

Slavery and Human Trafficking, and, preventing them from being drawn into terrorism.

Our values symbolise what we stand for as an organisation and set expectations for our employees and partners. Our policies are designed to embody these values, providing guidance to help us make the right decisions and advice on what to do if we witness behaviour that does not reflect our values.

Section 2 – Definitions

Some Colleges within Navitas UPE operate their own specific procedures for securing the safety and wellbeing of children and vulnerable adults in accordance with guidance from relevant professional or sponsoring bodies and the University Partner. Where this is evident, Colleges are required to ensure that their own specific procedures comply, as a minimum, with the requirements of this overarching Policy.

Definitions

Navitas UPE uses the following definitions for the purposes of this Policy:

- '**Child**' or '**children**' refers to a person or persons under the age of 18 years.
- '**Adult at Risk**' refers to any person aged 18 or over, who has needs for care and support (whether or not the local authority is meeting any of those needs) and is experiencing, or is at risk of, abuse or neglect; and as a result of those care and support needs, is unable to protect themselves from abuse or neglect or the risk of it.
- '**Safeguarding**' refers to the arrangements made to protect the health, wellbeing and human rights of a child or an adult at risk, and enabling them to live free from harm, abuse and neglect.
- '**Regulated activity**' refers to activities and work that a person who has been barred by the Disclosure and Barring Service (DBS) must not do.
    - '**DBS Checks**' refers to criminal records checks in the UK through the Disclosure and Barring Service (DBS).

Section 3 – Student Admission

Admission of a Student Under the Age of 18 and Vulnerable Adults

Throughout the admission process all applicants must be treated equally and on academic and English language achievement grounds. Applicants applying for a student visa must be at least 16 years of age at the point of visa application, in line with UKVI requirements. Where the University Partner has specific risk assessment requirements surrounding students on a course under 18 years of age, these should be consulted, discussed in full and agreed with the University Partner prior to any admission being granted. Deferred entry to a pathway or programme will be granted where appropriate.

Navitas UPE strongly encourages applicants to fully disclose their disabilities or specific learning requirements as early as possible in order to ensure that any necessary support and reasonable adjustments can be arranged. Each College has policies and procedures in place reflecting the collaborative approach with the University Partner.

Navitas UPE requires parent(s)/legal guardian(s) to sign the Declaration Form contained within the Offer Pack. By signing this form, they acknowledge that they have read and understood the expectations of their child studying in a higher education learning environment. Additionally, parent(s)/legal guardian(s) must provide the College with a 'Parental Consent Letter' if their child will be under 18 years of age at the point that Confirmation of Acceptance for Studies (CAS) sponsorship is issued. The letter must include the parent(s)/legal guardian(s) consent to study, travel and pick up arrangements (reception), as well as the living arrangements. This includes any consent to travel and live independently in the UK.

The Parental Consent Letter must be signed by both parents/legal guardians. Where only one parent or guardian is able to provide consent, the College must request supporting documentation evidencing sole legal guardianship or parental responsibility. This must be verified in line with UKVI safeguarding requirements before the CAS is issued.

The applicant/student's birth certificate must be submitted with the parental consent letter, together with the passport ID pages for the parent(s)/legal guardian(s). Signatures on the declaration form and parental consent letter must be checked against the submitted identification

documents to verify the relationship between the applicant/student and the signatories.

Applicants and parent(s)/legal guardian(s) not resident in the UK will be made aware that it is necessary for them to appoint a UK Guardian until the student turns 18 years of age. Navitas UPE Colleges will advise parent(s)/legal guardian(s) to approach the Association of Educational Guardians for International Students (AEGIS) for advice on the appointment of a Guardian or to assist more generally in the process of determining a suitable UK based Guardian. Whilst liability for the appointment of a UK Guardian remains that of the student's parent(s)/legal guardian(s), the College Director/Principal reserves the right to not recognise an appointed UK Guardian if they deem them to not be suitable, and to require an alternative UK Guardian to be appointment. The individual will typically be expected to:

- Be over 25 years old
- Not be a current student in the UK
- Be legally resident in the UK and cannot be on a visitor visa
- Be easy to contact in case of emergency

UK Guardians should be aware of the importance of their role and should therefore be able to respond to any issues that may arise during the student's studies. Parent(s)/legal guardian(s) will be asked to provide confirmation of a UK Guardian as part of the offer stage of the admissions process.

Colleges must collect and retain a copy of the UK Guardian's passport, evidence of their right to reside in the UK, full contact details, residential address and the relevant guardianship form. The College must verify that the proposed UK Guardian is suitable, contactable in an emergency and able to provide appropriate care and support arrangements for the student until they turn 18. Where the student requires Student visa sponsorship, these checks and supporting documents must be completed and retained before the student is enrolled.

Procedures for the Recruitment of Students Under 18 Years of Age and Vulnerable Adults

Admissions of Students Under 18 years of age:

The Admissions team are responsible for ensuring that all applicants under the age of 18 and their

parent(s)/legal guardian(s) are provided with information relating to the expectations and responsibilities of all parties involved in their enrolment. The Application Form will include the applicant's date of birth which must be checked, alongside the applicant's passport, in all instances prior to any Offer of Admission being made. An Offer of Admission may be made to a student under 18 with the provision that the Offer cannot be confirmed or approved as fully accepted by the Admission Office until such time as the parent(s)/legal guardian(s) have completed and signed all associated documents requested by the Admissions team including the Under 18 Acceptance of Offer Form giving specific parental consent. In doing so they indicate that they agree to all statements and therein conditions of the status of their child until they turn 18 years of age. UKVI Safeguarding checks apply, even if the student turns 18 at an enrolment stage. If the student is under the age of 18 at an offer/CAS stage, all necessary checks must be completed, recorded and evidenced accordingly.

Vulnerable Adults Admission:

Navitas UPE reserves the right to decline admission to a programme of study or participation in other Navitas UPE-managed activities where it determines that the reasonable and proportionate adjustments required to safeguard the individual's wellbeing cannot be adequately provided. Where adaptations are reasonable and proportionate, the College will put in place appropriate measures to help safeguard the wellbeing of vulnerable groups. The College's collaborative relationship with the University Partner means policies are in place which reflect and complement the University Partner's approach to student support. The College may consult the University Partner in supporting the conclusion of whether reasonable adjustments can be made.

Accommodation and Contracts

Navitas UPE aims to help support all new students to source accommodation if requested. It is ultimately the responsibility of each student (including students under 18, their parent(s) or guardian(s)) to assess whether the accommodation on offer is suitable for their needs and whether the terms of occupancy are reasonable.

Any person under the age of 18 is unable to enter a legal contract. If a student under 18 needs to enter a contract with an accommodation provider a parent or guardian is required to guarantee the student's obligation under that contract including the payment of rent or other associated fees. A failure to pay any sums due under a contract may result in demand being made by the contractor on

the parent of guardian. Any continuing failure to pay may result in a student's studies being interrupted.

Students under 18 are actively encouraged to participate in clubs and societies organised by the College and/or the University Partner's Student Union (where the University Partner allows). However, students are unable to hold Office until they reach the age of 18, as they will be unable to discharge an office-holder's legal responsibilities.

Responsibilities of Parents, Legal Guardians and Carers

Navitas UPE maintains a general duty of care for all individuals on its premises. If a child is brought onto campus, it is the responsibility of the adult bringing them onto campus to ensure they are kept safe. If a student or staff member has a safeguarding concern about a member of the public, including research participants, they should contact a designated safeguarding officer. Parents, guardians or carers must always maintain line-of-sight supervision.

Unless they are students of Navitas UPE or are attending the College as part of an authorised visit or activity, all students including children and vulnerable adults are not allowed to enter learning environments, laboratories, workshops or other premises which present hazards or contain valuable or fragile equipment.

Section 4 – Criminal Record Checks

For the safety and wellbeing of students and staff of Navitas UPE, the College will follow the University Partner Disclosure of Criminal Convictions Policy for student processes and the Navitas UPE Criminal Records Policy, Criminal Records Policy.pdf, the Criminal Records Checking Procedure Criminal Record Checking Procedure.pdf and the DBS Check Guide for staff processes., DBS Check Guide.pdf.

Criminal Record Checks of Students (Recruitment, Studying and Employment)

Criminal Records Checks During Admission:

As a condition of admission to certain programmes of study, particularly where a student will come into close contact with children or vulnerable groups, a student may be required to undergo a suitable level of DBS disclosure prior to the commencement of the programme or placement of

study.

Except in relation to specific programmes of study/placements (see previous paragraph) the College has limited powers to ask about unspent criminal convictions on admission. Where, during the admissions process, a conviction is disclosed indicating that an individual poses a clear risk to vulnerable groups, the College has the right to deny admission as a student.

The College does not consider it practicable to take steps other than those described in this section, to check the backgrounds of students who, during learning and teaching activities and administrative activities, come into contact with other students who are vulnerable. The College takes a risk management approach to organising and adapting the delivery of curriculum and services through the use of risk assessments.

If a DBS check indicates that an individual is barred from working with children or vulnerable adults then they will not be offered a place on any course requiring placement that involves regulated activity, is allowed to work as a volunteer in such a position, or to undertake research involving children or vulnerable adults. They may be counselled to seek an alternative course if this is deemed appropriate.

Any international students enrolling into a college who do not have a required DBS for their programme, will need to be in the UK for six months before applying.

Partnership Risk Panel

Where a Navitas UPE College becomes aware of evidence of criminal convictions through a DBS check indicating that children or vulnerable adults might be placed at risk, or during a self-disclosure process, this will be reviewed collaboratively by Navitas UPE and the University Partner.

This process will determine if the disclosed convictions are both relevant and not spent (as defined by the Rehabilitation of Offenders Act 1974). Any disclosed convictions that fail to meet these criteria are excluded from further consideration by the Partnership Risk Panel.

For programmes requiring an enhanced DBS check, offer holders are asked to disclose all spent and unspent convictions as part of the self-declaration process. Any disclosure will be shared with

appropriate representatives within the faculty to undertake the Faculty Based Risk Assessment.

For those convictions that are determined to be both relevant and unspent:

- Further information may be sought from a Probation Officer or other agency
- The information disclosed will be considered by the Partnership Risk Panel to assess the level of risk to the Partnership community and any further actions as required

Criminal Records Checks of Staff (Recruitment and Employment)

For the safety and wellbeing of students and staff of Navitas UPE, the College will require a level of DBS check to be undertaken by all staff. Where a member of staff undertakes regulated activity, an enhanced DBS with a barred list check will be required. To determine the level of check required, consideration is given to the number of under 18 students and frequency and circumstances of contact with this group of students.

Navitas UPE Colleges will follow all guidance relating to recruitment and onboarding of new staff as issues by the Human Resources department. No staff probation period can be successfully completed without a DBS being obtained. A probation period will need to be extended and the staff member will need to be chaperoned until the DBS certificate is issued. CDPs should consult with HR for further guidance.

Where a current staff member has a College previously issued DBS certificate, and has not signed up to the update service, the College CDP will request a new DBS certificate every three (3) years. The College are responsible for monitoring the DBS and reserve the right to check the status of a DBS at any time.

It is illegal for an organisation to knowingly allow a person barred by the DBS to work in regulated activity.If Navitas UPE staff member leaves or is dismissed from regulated activity because they have abused or harmed children or vulnerable adults, Navitas UPE has a legal responsibility to report the person concerned to the DBS. This responsibility will normally be undertaken by the DSL/CDP in consultation with the HR Team.

Navitas UPE recognises the need to take a proportionate approach to personal and DBS disclosures and will treat all such information in the strictest confidence. Navitas UPE will not discriminate

unfairly based on such information.

Staff Responsibilities

a) Statement of Good Practice

Navitas UPE has a Statement of Good Practice for those who come into contact with all students including children and vulnerable adults as part of their work with Navitas UPE. All staff are expected to be guided by this Statement.

Navitas UPE staff and students should always:

Safeguarding Statement	Values in Action Section & Page	Key Alignment Notes
Treat children and vulnerable adults fairly, equally and respectfully and should not show favouritism or disfavour.	Respect for Each Other (p.6), Diversity, Equity & Inclusion (p.12)	Commitment to fairness, dignity, and inclusion aligns with equal treatment.
Be sensitive to the child or vulnerable adult's appearance, race, culture, religious belief, sexuality, gender or disability.	Diversity, Equity & Inclusion (p.12), Acknowledgement of Country (p.2)	Promotes cultural respect and sensitivity to diversity.
Act as a good role model and challenge any unacceptable behaviour from others within the Navitas UPE community towards children or vulnerable adults.	Leading by Example (p.10), Diversity, Equity & Inclusion (p.12), Sexual Harassment (p.13)	Encourages role modelling and intervention against misconduct.
Report allegations or suspicions of harm or abuse of children or vulnerable adults in line with this Policy.	Raising Concerns & Speak Up (p.9), Wellness, Health & Safety (p.13)	Clear reporting channels: DoneSafe, Whispli, HR.
Work, where possible, in an open environment with children and vulnerable adults so that others can clearly observe and hear you.	Appropriate Relationships (p.12), Wellness, Health & Safety (p.13)	Supports transparency and professional boundaries.
Be aware that physical contact and speaking, acting or jesting in certain ways with a child or vulnerable adult may be misinterpreted.	Appropriate Relationships (p.12), Sexual Harassment (p.13)	Highlights risk of misinterpretation and need for caution.
Avoid physical contact with a child or vulnerable adult unless it is reasonably necessary for health and safety or their wellbeing.	Appropriate Relationships (p.12), Wellness, Health & Safety (p.13)	Allows contact only when justified by safety/wellbeing.
Respect the right to privacy of a child or vulnerable adult and do not enter any private room occupied by a child or vulnerable adult alone unless	Protecting Information Privacy (p.15), Appropriate Relationships (p.12)	Privacy obligations and boundaries reinforce safe practice.

necessitated by an emergency.		
Avoid unaccompanied journeys in a vehicle with a child or vulnerable adult unless necessitated by an emergency.	Appropriate Relationships (p.12), Wellness, Health & Safety (p.13), Reputation & Communication (p.15)	Solo transport raises boundary and reputational risks.

Navitas UPE expects all its staff and students to act in an exemplary manner towards children and vulnerable adults and to ensure that their behaviour does not lead to concerns about their integrity and moral standing or to allegations of harm or abuse.

This Statement is not intended to present an exhaustive list but sets out general expectations of behaviour in terms of what Navitas UPE regards as appropriate behaviour.

b) Higher Levels of Responsibility

All students requiring support, including under 18 and vulnerable adults are monitored using Compass (see Student Support Policy: QS07 Student Support Policy, which provides oversight of the student's welfare and wellbeing.

Each College will hold a record of all students' emergency contact details for parents and legal guardians.

Each College will ensure that relevant student facing support staff, students and other personnel will receive appropriate training in working with those under 18 and vulnerable adults.

Each College will seek to cultivate an environment that encourages students to approach staff if they have any concerns.

c) Declaration of Investigations, Cautions and Criminal Convictions

All staff are required to notify the DSL/CDP or Navitas UPE HR Team if they are the subject of an investigation by the police or other safeguarding agency into an allegation of all students including the abuse of a child or vulnerable adult. Staff are also required to notify the above members if they receive a police caution or conviction for a criminal offence.

Disciplinary action may be taken against staff failing to disclose this information. CDPs should consult with HR for further guidance.

d) Risk Assessments

Members of staff with responsibility for activities at the College or run by Navitas UPE which involve all students including children or vulnerable adults, must ensure that they conduct a risk assessment of the activities involved and take appropriate steps to protect the welfare of the children or vulnerable adults. Guidance on producing risk assessments is available from the Navitas UPE's Wellness, Health and Safety (WHS) team.

Members of staff with responsibility for activities at the College or run by Navitas UPE which involve all students including children or vulnerable adults, must confirm with the DSL/CDP that the College has appropriate insurances in place to indemnify the proposed activity. Complex cases should be discussed at a designated safeguarding panel and monitored on Compass.

e) Sexual Relationships

In line with UK safeguarding legislation, including the Sexual Offences Act 2003, it is a criminal offence for a person in a position of trust to engage in sexual activity with an individual under 18 who is under their care, supervision, or authority. Navitas UPE regards such behaviour as gross misconduct and will address it under its disciplinary procedures.

Please see Navitas UPE Policy: Staff-Student Relationships Policy

Section 5 – Reporting Suspicions, Allegations or Actual Incidents

Reporting

The welfare of all the students must be paramount. Members of staff have a duty to report suspicions, allegations or actual incidents to the College SO (or DSL in their absence) in the first instance (see 'Key Contacts' section), regardless of whether the information has been disclosed in confidence to them or if they remain unsure of their suspicions. Suspicions must not be discussed with anyone else on campus other than the SO (or DSL in their absence). Staff who fail to discharge this responsibility may be liable to disciplinary action. In addition to reporting suspicions, allegations or incidents to DSL - all incidents or safeguarding concerns must be recorded promptly and accurately on Donesafe, the Navitas UPE secure incident and hazard reporting software. All

cases which require ongoing low-level monitoring of any reasonable adjustment as a result of a safeguarding report must be reported and monitored on Compass.

Please see Annex B for more information about the recommended approach to a report.

Step 1: Disclosing or reporting a concern or incident

Any suspicions, allegations or actual incidents must be recorded on DoneSafe, the Navigate incident and hazard reporting tool, as well as to the College DSL. Failing the availability of the DSL and / or the College SO, the CDP must be informed of the allegation, suspicion or incident unless where the CDP is the DSL and therefore the LSO is to be contacted.

There are three different levels of reporting, and the decision about whether to do one, two or all three rests with the person raising the concern/incident.
They may choose to:

- Make an anonymous disclosure
- Make a named disclosure
- Submit a formal report

The Donesafe incident reporting software is the primary reporting tool for students or staff members to lodge anonymous disclosures, named disclosures, or a formal report. Donesafe must be completed as soon as possible after receiving information that causes suspicion or an allegation of the abuse of any student including a child or vulnerable adult. Do not delay by attempting to obtain information to complete all the details.

Students: Click here to access the portal: Donesafe

Staff: Click here to access the portal anonymously Donesafe

Click here to access the portal through your **Navitas UPE user account** Donesafe

Where there is an immediate concern or a person's physical wellbeing is under threat the correct referral process is to call 999 and then inform the College Designated Safeguarding Lead (DSL).

Please note:

- Disclosers also have the option of making a formal report as a first step. They may also wish to make a report to the Police.
- Making a report to the Police will not stop Navitas UPE from acting on reports or issuing a referral of a report unless Navitas UPE is advised by the Police that an internal investigation may impact a Police process.
- Disclosers may choose to report a concern/incident directly to the University Partner through the separate reporting procedures and tools of the University Partner.
- Navitas UPE may formally report or investigate anonymous or named disclosures where warranted by the circumstances of the concern/incident.

Step 2: Receiving a concern or incident

- If a student presents to a University Partner service (Student Hubs, Student Services, Security, etc.) then that service refers the student-to-Student Services for an initial assessment.
- Student Services team completes the initial assessment of the student. If the issue is about a University Partner service or member of staff the Student Services team will follow the University Partner's safeguarding policy and process.
- If the case is non-urgent and relates to a College service or staff member, Student Services refers the student to the College to complete an assessment.
- If a student presents to College staff or has been referred from the University Partner Student Services, the Manager of Academic Skills and Support (MASS) (or equivalent) complete an initial assessment of the student.
- The Reporting Person informs the College DSL or College SO of the concern, allegation, or incident. If the College DSL and College SO is not available, the College Director Principal (CDP) will assume the role of DSL.
- If the student is under 18, the College SO may report the matter to the local Council/Authority depending on the circumstances. The College SO will collate details of

allegations or suspicion and review the matter with the College DSL (or Safeguarding Panel, Lead Safeguarding Officer (LSO) or Navitas UPE HR team, prior to any referral to the appropriate statutory authority (if deemed applicable or if not already in action).

The concern, allegation or incident will be presented to the College DSL either:

- In person, by any member of staff, student or other individual engaged in Navitas UPE related activity or at a facility operated by Navitas UPE, or
- By receiving the disclosure through the reporting system DoneSafe.
- Where the concern or incident is raised in person the College DSL will add the concern or incident to the DoneSafe reporting tool entering the relevant details of the case.
- Where the concern/incident is raised directly through the reporting tool DoneSafe the College DSL will receive notification and details of the concern or incident within 24 hours.

The College DSL must then consider all the evidence received and determine on the balance of information to request further or supporting information from the staff member, student or individual reporting a concern or incident to determine whether a referral to the University Partner is to be made.

At this stage the College DSL may consult with the CDP, Designated Safeguarding Lead Officer, Navitas UPE Executive Prevent, Navitas UPE HR Representative (where a concern/incident has been made about a Navitas UPE staff member) and/or the University Partner Safeguarding Lead (or equivalent) to seek further advice on making a referral.

Once the safeguarding case is complete and the student is no longer considered at risk by formal stakeholder approval, then the student welfare and wellbeing must be monitored on Compass. Please refer to QS07 Student Support Policy and accompanying Compass resources for further guidance.

Where Navigate is not the central student record system used by the College, it is expected that the College will monitor students using the approved software authorised within the partnership contract. Colleges will be expected to report Compass data and information through regular monitoring processes.

Step 3: Referring to the University Partner

The College DSL will share information of the concern or incident (refer) with the University Partner Safeguarding Lead (or equivalent) and remain in close contact throughout the case management. The University Partner will also determine, in collaboration with the Navitas UPE College, the most appropriate support required to an individual as the concern/incident is being managed. This will include decisions on disciplinary matters where a concern/incident warrants the enactment of the policy (see Student Disciplinary Policy or Staff Disciplinary Procedure).

If the concern arises out of normal office hours, contact should be made with the local Council/Authority Child Protection team (See 'Key Contacts'). Advice can also be sought from a professional practitioner through the NSPCC Helpline (see 'Key Contacts') **or if someone is in immediate danger call the Police (999).**

It is recognised that staff and/ or students may need support after receiving a disclosure or are involved in a concern, allegation, or incident, and will be offered appropriate counselling using the counselling referral process or will be referred for support through the Navitas UPE HR and external specialist support organisations.

Staff must not attempt to deal with a suspicion, allegation, or actual incident themselves but must report it through the channels outlined above. All suspicions and allegations will be taken seriously and will be responded to swiftly and appropriately.

Step 4: Safeguarding Officer and/or Designated Safeguarding Lead response:

On being notified of any suspicion, allegation, incident or apparent abuse involving Navitas UPE staff or students the SO/DSL shall:

1. Take such steps considered necessary to ensure the safety of the student, including child or vulnerable adult, in question and any other student who might be at risk.
2. Liaise with the person who reported the original concern and ensure that a report of the incident(s) is completed on Donesafe.
3. Consult with other Navitas UPE staff members if deemed appropriate or take advice if required (e.g., Safeguarding Panel, LSO or Navitas UPE HR team).

4. Report the matter to the local Council/Authority where appropriate*
5. If the SO/DSL are the subject of the suspicion, allegation, incident or the claim of apparent abuse then this must be reported to on DoneSafe immediately – all staff and student reports MUST be made on Donesafe.

*The SO will collate details of allegations or suspicion and review the matter with the DSL (or in collaboration with the University Partner Risk Panel, LSO or Navitas UPE HR team) prior to any referral to the appropriate statutory authority (if deemed applicable or if not already in action).

Suspension

The SO or DSL, based on evidence and in consultation with the Safeguarding Panel, LSO and/or the Navitas UPE HR team may decide to suspend the Navitas UPE staff member or student for the period of the investigation. Navitas UPE HR team should be consulted on and involved with any safeguarding staff matter or performance related concern / activity. Suspension in this context is not a disciplinary measure and implies no assumption of guilt. Depending upon the outcome of the investigation, the Navitas UPE staff member or student may be liable for further suspension and disciplinary action.

Navitas UPE with support from HR, may refer a member of staff to the relevant professional body if there are concerns over their suitability to practise and/or remain on the professional register or equivalent. Please also see above **Section 4 – Criminal Record Checks.**

Where the situation involves a member of staff from the University Partner, the SO or DSL will raise this with the University Partner Safeguarding Team/Lead and the College CDP.

Reporting Concerns from Placements, Mentoring Schemes, Projects or External Visits

Staff and students who are undertaking activities at the premises of another organisation should familiarise themselves with the host organisation's safeguarding policies and procedures and the name and contact details of the organisation's Safeguarding Officer or Designated Safeguarding Lead.

Students with concerns about all students including child or a vulnerable adult, with whom they

come into contact in a placement, through a mentoring scheme, a project setting or during external visits should follow the procedure in place at the visiting institution and report immediately on Donesafe. If, for whatever reason, the student feels that this is inappropriate or they lack the confidence to raise their concerns then they should refer their concern to the member of Navitas UPE staff who is supervising their placement, mentorship scheme or project. This member of staff should then follow the procedure set out in step 1 of this reporting section.

Reporting Other Concerns

There may be instances when a member of staff receives information in the course of their normal duties about allegations of abuse towards all students including child or vulnerable adults, that are unconnected with the activities of Navitas UPE or the use of its premises (Colleges or Campuses). In such instances, staff must exercise a duty of care and should report this on Donesafe immediately and either encourage the informant to report the matter to the appropriate agencies or, if they remain concerned, make a report themselves. If, for whatever reasons, a member of staff in receipt of an allegation feels that it is inappropriate for them to make the report then they must refer their concerns to the College SO (or DSL in their absence) who will contact the appropriate agency.

Whistleblowing

Whistleblowing is an important aspect of a safeguarded Institution. Any individual has the right and the responsibility to raise concerns, without prejudice to their own position, about the behaviour of staff, students or other persons which may be harmful to those in their care and will receive appropriate support when doing so.

In accordance with the Navitas UPE Whistleblowing Policy Navitas UPE Whistleblowing Policy will support and protect those individuals, who, in good faith and without malicious intent report suspicions of abuse or concerns. Staff and students are encouraged to report issues in the first instance to their direct manager/supervisor or College SO/DSL, however, if this is not appropriate (fear of doing so, uncomfortable, etc) the matter can be reported directly to the Whistleblower portal 'Speak Up through Whispli'.

The portal is operated by an independent third party and accessible 24/7 through the Navitas UPE intranet or at https://navitas.whispli.com/Navitas-Anonymous-Reporting?locale=en.

Record-Keeping

All safeguarding correspondence and communication in relation to students will be recorded in the Notes function on the Navigate Student Management System and cases maintained using Compass. If the case involves a permanent member of College staff, all record keeping will be maintained on the Navitas UPE Donesafe system.

Section 6 – Further Information and Guidance

Accident Reporting Involving Children or Vulnerable Adults

Any accident on Navitas UPE premises involving a child or vulnerable adult must be reported to the Navitas UPE's WHS Team immediately and formally recorded on the accident reporting system in Donesafe as soon as possible.

Safeguarding and Protection from Radicalisation (Prevent)

Navitas UPE has due regard for the Prevent Duty and complies with its statutory duty to help stop people from being drawn into terrorism or support for terrorism through radicalisation. All members of the College community have the right to speak freely and to express their opinions in line with the values of inclusion, tolerance and freedom of speech. As with managing other safeguarding risks, all members of the College must be vigilant to the risks of radicalisation and must report any activities or behaviour of concern. Any concerns should be reported to the nominated Prevent Lead in the College or in their absence the CDP. Please read the Prevent Policy Navitas UPE Prevent Policy for further advice and guidance.

Staff training:

Annual safeguarding training and interim awareness, including policy and procedure updates, is provided to all College staff to enable them to fulfil their function effectively. This will include any new staff members as part of the onboarding process at the Navitas UPE College.

The training is tailored to meet the Navitas UPE specific operating context and is informed by the University Partner, relevant national and international legislation and best practice statements - Engagement with any relevant training shall be recorded by the Navitas UPE College and refreshed every year as appropriate.

The College DSL will undergo additional training to enhance knowledge and provide themselves with necessary skills to best meet student needs.

Navitas UPE DSLs also engage in monthly reporting forums and contribute to the Divisional Safeguarding Committee every semester.

Students will be made aware of the key principles of this policy and the subsequent procedural requirements during their orientation period with the Navitas UPE College. This may be through induction materials or through the guidance of the student handbook.

Confidentiality and Data Protection

As far as possible, the confidentiality of all individuals involved in any allegation, investigation or resulting disciplinary proceedings will be respected by Navitas UPE. However, there may be circumstances in which it is necessary for Navitas UPE to share information with parties such as social services, the police, and the parents, guardians or carers of the students including children or vulnerable adults concerned. Information may also need to be disclosed if there is a public interest imperative. Navitas UPE cannot therefore guarantee that the confidentiality of any disclosures can be maintained in all circumstances.

The GDPR and Data Protection Act 2018 do not prevent, or limit, the sharing of information for the purposes of keeping children and vulnerable adults safe. Where there are concerns about the safety of a child or vulnerable adult, the sharing of information in a timely and effective manner between organisations can improve decision-making so that actions taken are in the best interests of the students including children or vulnerable adults. The GDPR and Data Protection Act 2018 place duties on organisations and individuals to process personal information fairly and lawfully; they are not a barrier to sharing information, where the failure to do so would cause the safety or wellbeing of a student including children or vulnerable adults to be compromised. Similarly, human rights concerns, such as respecting the right to a private and family life would not prevent sharing where there are real safeguarding concerns. The most important consideration is whether sharing information is likely to support the safeguarding and protection of all students including child or vulnerable adults.

If a staff member or student is uncertain about sharing sensitive information or in an instance where

the local authority or emergency services are involved (Police) the Navitas UPE Data Privacy team must be informed to ensure the necessary laws and regulations regarding processing data are met. All staff must be aware of this Policy and must abide by its requirements.

This policy will be communicated to staff and students once per academic year. It will be published on the College website and on Policy Hub (staff access) to ensure that it is available to all those within the Navitas UPE community.

Further Information and Guidance

Further information, guidance and interpretation of this Policy should be sought from the College SO/DSL in the first instance.

The Disclosure and Barring Service maintains guidance on making referrals outlining legal duty and general information on safeguarding. This can be found at:
https://www.gov.uk/guidance/making-barring-referrals-to-the-dbs#referrals-for-automatic-barring-offences

The UK Government provide advice and guidance for schools, colleges and children services:
https://www.gov.uk/topic/schools-colleges-childrens-services/safeguarding-children

Furthermore, **the NSPCC** contain a host of practical guidance and advice on their website:
https://learning.nspcc.org.uk/safeguarding-child-protection

Policy Review

This policy will be reviewed every year unless there are internal or legislative changes that necessitate an earlier review.

Annex A: Potential Indicators of Harm, Abuse or Neglect

Harm, abuse or neglect can take many forms and can include, but not be limited to:

What Constitutes a Safeguarding Matter?

Safeguarding does not only apply to regulated activity for all students including under 18-year-olds and adults at risk of harm; it also encapsulates the following activity:

- Physical abuse
- Emotional abuse
- Sexual abuse, violence or harassment
- Domestic abuse
- Significant Substance Misuse
- Self-harm
- Upskirting
- Initiation/hazing type violence
- Online abuse (including harassment, abuse, sharing nude /semi-nude images/videos/livestreams/harmful sexual content)
- Neglect
- Honour based abuse (FGM, Forced Marriage, other abuse in the name of honour)
- Child on Child abuse.
- Bullying
- Homelessness and missing from education.
- Child protection matters.
- Contextual safeguarding (wider environmental factors that are a threat to the safety and welfare of the student).

What Constitutes a Welfare Matter?

A welfare matter refers to any issue that affects a student's overall well-being, safety, and ability to engage positively and effectively in their education. This can include concerns related to:

- Mental health (e.g. anxiety, depression, emotional distress)
- Physical health and well-being
- Communicable / infectious disease

- Admission to hospital
- Safety concerns (including students who have been the victim of a crime)
- Failure to register with a GP
- Housing or financial difficulties
- Family or personal issues impacting upon academic study
- Substance misuse
- Social isolation or loneliness
- Academic pressures affecting mental or emotional well-being
- Concerns about another student's welfare

Detailed definitions:

Physical abuse:

Physical abuse is deliberately causing physical harm to another person. This might involve punching, kicking, biting, burning, scalding, shaking, throwing or beating with objects or implements. It can include giving a child or vulnerable adult alcohol or illegal drugs.

Emotional abuse:

Emotional abuse is where repeated verbal threats, criticism, ridicule, shouting, lack of love and affection causes a severe adverse effect on a child or vulnerable adult's emotional development. It may feature inappropriate expectations being imposed on a child or vulnerable adult, over-protection and limitation of exploration and learning, or preventing the child or vulnerable adult from taking part in normal social interaction.

Sexual abuse:

Sexual abuse involves forcing or enticing a child or vulnerable adult to take part in sexual activities, whether or not the child or vulnerable adult is aware of what is happening. This may involve physical contact, or it may involve non-contact activities such as involving children or vulnerable adults in watching sexual activities, producing or looking at sexual images, encouraging children to engage in sexual acts or behaviour (including sextortion), or grooming a child or vulnerable adult in preparation for abuse (including via the internet).

Neglect or acts of omission:

Neglect is the persistent failure to meet a child's or vulnerable adult's basic physical and/or psychological needs in a way that is likely to result in serious impairment of their health, development or wellbeing. It can include failure to provide adequate food, clothing, shelter (including exclusion from home or abandonment), medical care, or protection from physical and emotional harm or danger. It also includes failure to ensure access to education or to look after a child or vulnerable adult whilst under the influence of alcohol or drugs.

Online abuse:

Online abuse is any form of abuse that happens via the internet, whether through social networks, online games or mobile telephones. It may involve cyberbullying, grooming in preparation for abuse, sexual abuse, sexual exploitation (sextortion), financial or emotional abuse. In such cases, the abuser may be known to the child or vulnerable adult, they may not be known, or they may disguise their real identity.

Financial abuse:

Financial abuse (often termed "financial or material abuse") is the unauthorised or improper use of funds, property, or assets belonging to an individual. It involves theft, fraud, coercion, or the misappropriation of a person's benefits, belongings, or inheritance.

Key Legal Definition Under the Care Act 2014, financial abuse includes:

- Having money or other property stolen.
- Being defrauded or scammed.
- Being put under pressure, coercion, or duress in relation to money, property, or wills.
- Having money or other property misused or misappropriated.
- Common Forms of Abuse

Financial abuse can happen suddenly or develop slowly over time and is most frequently perpetrated by someone the victim knows and trusts, such as a family member, friend, or paid caregiver. Common signs include:

- Asset misuse: Using a bank account, cards, or property without the owner's permission.
- Coercion: Forcing someone to change their will or hand over their benefits, pension, or allowances.

- Financial entrapment: Preventing an individual from accessing, choosing, or managing their own money.
- Commercial exploitation: Rogue trading, overcharging for home repairs, or internet and doorstep scams

All students including children and vulnerable adults can be subject to one or more forms of abuse at the same time. They may display physical symptoms of abuse or neglect in the form of injuries or untreated medical issues; they may exhibit behaviour or knowledge that is inappropriate or unexpected for their age or circumstances; they may appear to be uncomfortable in the presence of certain people or being left alone with them; they may also exhibit aggressive or anti-social behaviour or display symptoms of depression or anxiety.

Self-Harm and Wellbeing Support:

It is important to recognise that harm, abuse and neglect may be inflicted by others or may be inflicted by an individual upon themselves.

Navitas UPE adopts a safeguarding-led approach for all students including under 18s and vulnerable adults who may be experiencing self-harm or suicidal thoughts. Concerns may be identified by any member of staff and must be reported in line with safeguarding procedures to the Designated Safeguarding Lead.

All reported concerns are risk assessed and, where appropriate, subject to ongoing monitoring, case review, and coordinated intervention through safeguarding processes. Students identified as being at risk are supported through referral to appropriate internal and external services, including counselling and wellbeing provision, and, where necessary, through formal processes such as Fitness to Study.

Staff are trained to recognise indicators of vulnerability and respond appropriately using a trauma-informed approach. Specialist safeguarding leads receive enhanced training and participate in regular forums to review practice, share learning, and maintain oversight of high-risk cases.

Navitas UPE seeks to promote early intervention, ensure timely access to support, and maintain a safe environment in which students can disclose concerns and receive appropriate care.

Annex B: Statement of Best Practice (Responders)

Responding to allegations or suspicions

If you receive an allegation of harm or abuse or suspect that this is occurring, then:

DO	DO NOT
• Stay calm and remain objective	• Do not panic or over-react
• Listen, hear and take seriously	• Do not probe for more information. Inappropriate questioning may influence how the allegation is received or considered by others at a later date
• Give time to allow the child or vulnerable adult to say what they want to say	• Do not make assumptions. Do not paraphrase or offer explanations or justifications for actions
• Reassure and explain that they have done the right thing in telling you about the incident	• Do not promise that complete confidentiality can be maintained
• Act immediately in accordance with the procedure in this Policy by informing the College SO	• Do not try to deal with the allegation by yourself
• Make a written record of what was said to you as soon and as accurately as possible	• Do not express your own opinions or conclusions in the report. Do not make a child or vulnerable adult repeat themselves unnecessarily
• Report the incident in accordance with the procedures outlined in this Policy	• Do not fail to report the incident or delay reporting the incident
• Maintain confidentiality about the incident and the people involved	• Do not divulge information to people that have no role in dealing with the incident

Annexe C: Quick Reference Guide for Staff