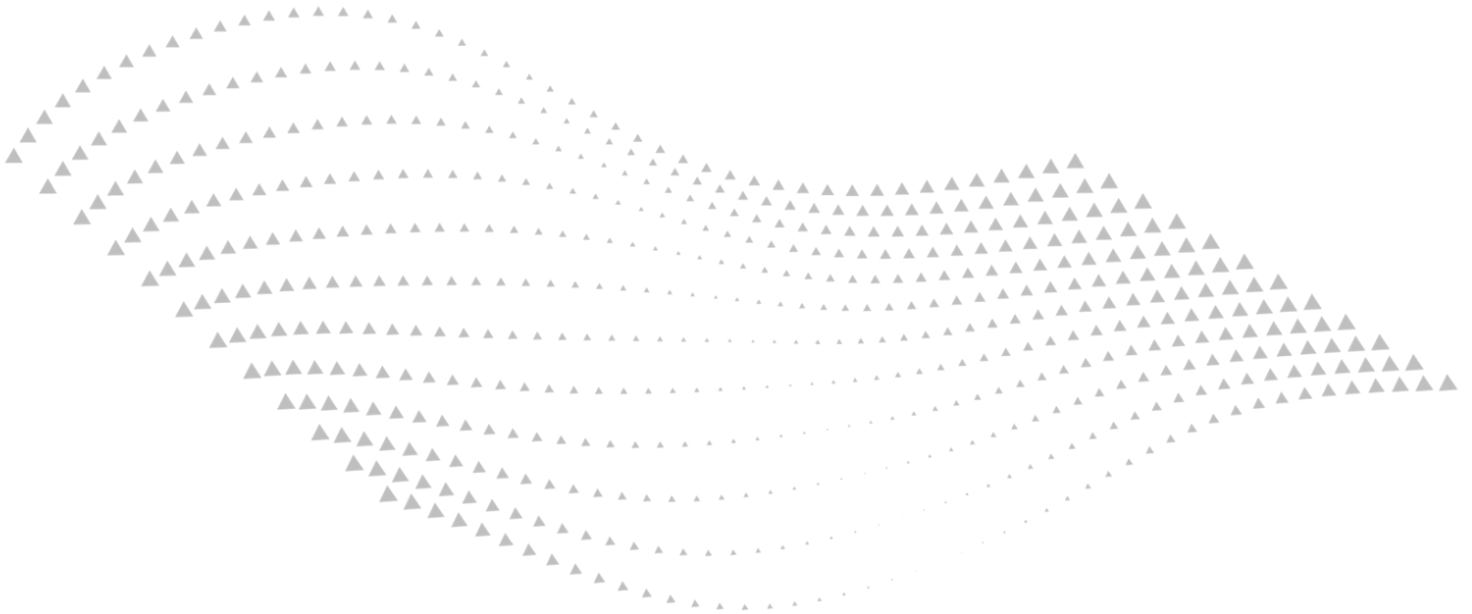


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## **Safeguarding Policy**



Last approved: March 2023

Approved by: Academic Board

Next review due: March 2027

## 1. Policy Definition & Scope

- 1.1 This Policy applies to both Further and Higher Education provision delivered at the University's UK Campuses and is overseen by the Student Experience Committee (a subcommittee of Academic Board), which reviews it annually to ensure it adheres to regulatory requirements.
- 1.2 This Policy sets out the principles and commitments of all the University's UK Campuses. In doing so, it aims to safeguard children and vulnerable adults, as well as its staff, volunteers, and partners in carrying out their duties in teaching, supervising, and supporting students at all campus sites and external facilities, both in the workplace and by distance learning.
- 1.3 For the purposes of this Policy, the University defines:
  - a **child** as a person who is under the age of 18.
  - a **vulnerable adult** as an individual over the age of 18 who may have a mental or other disability or illness and lacks the capacity to take care of him or herself (i.e., at risk of neglect); and/or who may be unable to keep him or herself safe from the risk of significant harm, abuse or exploitation, including the risk of radicalisation or being drawn into terrorism.
  - **staff** as anyone working at the University who encounters children or vulnerable adults, whether full time, part time, sessional or voluntary.
- 1.4 The University is committed to taking all reasonable steps to promote and safeguard the welfare of students engaged in any activity and all UK campuses pay close attention to, and work within the legislative safeguarding requirements and the statutory Prevent Duty. The Prevent Duty Guidance defines extremism as "vocal or active opposition to... values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs". The University promotes these values to its students via its [Universal Values Statement](#).
- 1.5 The University ensures that all staff understand that safeguarding is everyone's responsibility, and that all staff are aware of the signs and symptoms of abuse so that they can respond promptly and appropriately to safeguarding concerns. Where appropriate, the University works with other professionals to ensure a co-ordinated response to safeguarding issues.
- 1.6 The University ensures staff can identify students who have/have had a social worker so that they:
  - know who these students are;
  - understand their academic progress and attainment and maintain a culture of high aspirations for this cohort;
  - are supported to identify the challenges that students in this group might face;
  - make reasonable adjustments so that they act to best support these students.
- 1.7 This Policy aims to ensure that the University's UK Campuses implement appropriate arrangements, systems and procedures so that all staff have the right skills, means and resources to protect children and vulnerable adults from harm. Furthermore, the University recognises that students who are abused or witness violence may find it difficult to develop a sense of self-worth, and that the University may be the only stable, secure and predictable environment in the lives of those students at risk. The University will endeavour to support those students through a range of mechanisms, including a positive ethos where students feel secure and liaison with external agencies and expertise such as Social Services and other relevant support services.

## 2. Statutory Framework

- 2.1. In order to safeguard and promote the welfare of all members of the University community, the University will act in accordance with the following legislation and statutory guidance:

- Keeping Children Safe in Education (2022)
- Sexual Violence and Sexual Harassment between Children in Schools and Colleges (2021)
- A Guide to Child Performance Licensing (2020)
- Mandatory Reporting of Female Genital Mutilation – Procedural Information (2020)
- Inspecting Safeguarding in Early Years, Education and Skills Settings (2019)
- Working Together to Safeguard Children (2018)
- The Care Act (2014)
- The Children (Performance and Activities) Regulations (2014)
- The Children Act (1989 and 2004)
- The Education Act (section 175, 2002)

### **3. Policy Aims:**

#### **3.1. The Aims of this Policy are:**

- To clarify standards of behaviour for staff and students and raise awareness of child protection issues.
- To develop and implement procedures for identifying and reporting cases, or suspected cases, of abuse.
- To alert staff to the signs and indicators of safeguarding issues including abuse and neglect.
- To ensure the University practices safe recruitment in checking the suitability of staff to work with young people and vulnerable adults.
- To support young people and vulnerable adults who have been abused.
- To establish a safe environment in which young people and vulnerable adults can learn and develop and equip them with the skills needed to make them safe.
- To establish and maintain an environment where young people and vulnerable adults feel secure, are encouraged to talk, and are listened to.
- To reduce the potential risks to students of being exposed to violence, extremism, exploitation, or victimisation.

#### **3.2. In order to meet safeguarding aims, the University will:**

- assign the Head of Student wellbeing as the Designated Safeguarding Lead (DSL), who will be responsible for safeguarding issues and will receive appropriate training and support for this role.
- assign Deputy Designated Safeguarding Leads (DDSL), as appropriate, to work alongside the DSL, who will also be responsible for safeguarding issues and will receive appropriate training and support for this role.
- ensure all staff are aware of the systems which support safeguarding via staff induction.
- ensure all staff and relevant external parties know how to contact the DSL and the DDSL and are fully aware of their responsibilities.
- ensure that all staff and relevant external parties understand their own responsibilities in being alert to the signs of abuse and their responsibility for referring their concerns to the designated members of staff.
- notify Social Services and/or other appropriate agencies if there is an unexplained absence of a student who is on the child protection plan.
- notify Social Services and/or other appropriate agencies if there are any concerns about the welfare and safety of any students.
- develop effective links with referral agencies and cooperate as required with their enquiries regarding safeguarding matters.
- keep records of concerns about students, even where there is no need for immediate referral.
- ensure that all records are kept securely on the Child Protection Online Management System (CPOMS) in line with the University's IT and data protection policies.

- ensure strict adherence to procedures when an allegation of any kind concerning students is made against a member of staff.
- ensure safer recruitment practices are followed in line with the Recruitment Policy.
- ensure that where Further Education and Higher Education delivery occurs on the same premises, appropriate additional safeguarding measures are in place.

#### **4. The University's Responsibilities**

##### **4.1. All UK Staff will:**

- make themselves familiar with this Safeguarding Policy and the accompanying procedures, which will be provided at induction and made available on the University website.
- read Part 1 of Keeping Children Safe in Education annually; this will be added to individual PeopleHR profiles during induction and as updates are released.
- be alert to the signs of abuse as detailed in the accompanying guidance and act in accordance with this Policy if a student presents with indicators of abuse.
- report any concerns immediately to the DSL, or deputies, and identify children who may benefit from early help.
- raise concerns about poor or unsafe practice with the DSL.
- participate in annual safeguarding updates/training.

##### **4.2. Each Campus Dean will:**

- act as support to the DSL in relation to their safeguarding responsibilities.
- ensure all staff are compliant with section 4.1.
- ensure that where Higher Education and Further Education delivery occurs on the same premises, appropriate additional safeguarding measures are in place.

##### **4.3. The Designated Safeguarding Lead at each UK Campus will:**

- act as the main point of contact for all matters concerning Safeguarding in relation to students, coordinate action within the campus, and liaise with external agencies where appropriate.
- ensure that this Policy and any related procedures are adopted by the BIMM University Limited Board and are appropriately monitored.
- monitor all safeguarding concerns and ensure that these are followed up in a professional and timely manner.
- ensure that appropriate strategies for recording and reporting incidents are in place and reviewed regularly.
- act as a source of support, advice, and expertise to staff on all matters of safeguarding, including supporting staff when they are deciding whether to make a referral to an external agency including a referral to the Channel programme where there is a radicalisation concern.
- encourage a culture of listening to children and vulnerable adults and taking account of their wishes and feelings.
- liaise with their Campus Dean to inform them of issues, especially ongoing enquiries under section 47 of the Children Act 1989, and police investigations.
- ensure there are appropriately qualified DDSL's in place in the Campus.
- ensure that all Campus staff are familiar with this Policy and any related procedures.
- ensure parents are aware that referrals about suspected abuse or neglect may be made, and of the role of the Campus in this.
- link with the Local Safeguarding Children's Partnership to make sure staff are aware of training opportunities and the latest local policies on safeguarding.
- liaise with the People team to ensure the Campus complies with its responsibilities with regard to training staff on Safeguarding.

- liaise with families and the appropriate child protection agencies on individual cases and make referrals to appropriate agencies in consultation with the Local Authority Designated Officer (LADO).
- ensure that appropriate action is taken to exclude, refuse admission or employment to any individual who may pose a risk to children or vulnerable adults.
- ensure that all staff are aware of the early help that is available within the Campus and externally and support staff to access this as appropriate.
- ensure Safeguarding induction training takes place for all newly appointed staff, and whole staff refresher training, annually.
- provide a mechanism to ensure that all staff understand and are able to discharge their role and responsibilities as set out in Part 1 of Keeping Children Safe in Education.
- make use of Local Authorities' Levels of Need guidance when making a decision about whether or not the threshold for Early Help or Social Care intervention is met.
- refer a student to the Local Authorities' Multi Agency Safeguarding Hub (MASH) when there are concerns about possible abuse and neglect.
- refer a student to the Channel Panel when there are concerns about possible radicalisation or involvement in extremist groups.
- keep records of concerns on the CPOMS monitoring system about students, including the use of body maps, even where there is no need to refer the matter immediately.
- ensure that all child protection records are kept securely, separate from the main student file.
- ensure that all child protection files are transferred in a safe and timely manner when a student transfers to another campus.
- develop effective links with relevant agencies and other professionals and co-operating as required with their enquiries regarding safeguarding matters, including co-operation with serious case reviews, attendance at strategy meetings, initial and review child protection conferences, core group and child in need review meetings.
- undertake appropriate training every 2 years relevant to the role of the DSL and the Prevent Duty.

**4.4. The Deputy Designated Safeguarding Lead at each UK Campus will:**

- Take on the responsibilities listed above when deputising for the DSL.
- ensure that they receive regular training and updates on current safeguarding practice.
- ensure that they follow up any safeguarding concerns reported to them, and that they are dealt with in a timely and professional manner.
- make appropriate referrals to Social/Community Services and/or the Police, where there are concerns that the child or vulnerable adult is or may be, being abused.

**4.5. The University's People Team will:**

- be committed to operating safer recruitment procedures.
- facilitate induction activities, to include issuing Part 1 of Keeping Children Safe in Education, Annex A and the [Staff Code of Conduct](#), and providing access to training as appropriate to the role.
- monitor compliance with the [DBS Recruitment Policy](#) by ensuring that there are sound arrangements for appropriate checks on staff and that the Single Central Record is accurate and up to date.
- ensure that risk assessments are completed for new staff who have not completed a DBS check on commencement of employment.
- have robust procedures for managing allegations against staff, to include internal processes, liaison with the LADO and other agencies as appropriate, and submitting DBS referrals.

**4.6. The BIMM University Limited Board will:**

- have oversight of safeguarding and wellbeing matters via the delegated duties of its Academic Board.

- nominate and ensure that a member of the Executive Management Team has responsibility for Safeguarding across the UK campuses.
- nominate and ensure that a member of the Executive Management Team has responsibility for the Prevent Duty across the UK campuses.

**4.7. BIMM University will:**

- monitor legal and sector developments on safeguarding and wellbeing matters, establish best practice and ensure a consistent approach to the development and implementation of all associated policies, procedures and strategies across the University.
- ensure that UK Campuses contribute to inter-agency working, in line with the statutory guidance Working Together to Safeguard Children.
- monitor safeguarding arrangements to ensure that they take into account the procedures and practices set up by the Local Safeguarding Children's Partnership.
- ensure that there is an appropriate safeguarding response to any children who go missing from education.
- ensure that students are taught about keeping themselves safe in a way that is appropriate to their age and understanding.
- ensure that any member of staff found not suitable to work with students will be notified to the Disclosure & Barring Service (DBS) for consideration for barring.
- ensure there are procedures in place to handle allegations against UK Campus Deans, members of staff, volunteers and students.

4.8. As outlined in the University's [Prevent Duty Policy](#), each UK campus is responsible for appointing an appropriate member of its staff to act as a Local Prevent Lead, who will be responsible for developing and maintaining links with local Prevent Partners. Further information can be found in our [Prevent Duty Policy](#).

**5. Staff Training, Support & Supervision**

- 5.1. All staff members working with FE students will receive appropriate safeguarding and child protection training and receive refresher training every three years. In addition, they will receive safeguarding and child protection updates as required, but at least annually. Training will also include members of the Campus community who may not be employed directly by the University, e.g., Security Staff.
- 5.2. DSLs and DDSs will receive additional training so they can effectively fulfil their responsibilities, and this training will be refreshed biannually.
- 5.3. When staff join the University, they will receive induction in safeguarding children, which will include the identity and role of the designated safeguarding lead and any deputies. They will be directed to:
- this Policy
  - Part 1 of Keeping Children Safe in Education (KCSIE) 2022
  - the [Prevent Duty Policy](#)
  - the [Student Code of Conduct](#)
  - the [Staff Code of Conduct](#)
- 5.4. All volunteers, supply staff and regular visitors to the University will be given a visitors' notice, directed to this Safeguarding Policy, given the name of the DSL and informed of the University's procedures for reporting concerns.
- 5.5. We recognise that staff working at the University who have become involved with a child who has suffered harm, or appears to be likely to suffer harm, may find the situation stressful and

upsetting. We will, therefore, support such staff by providing supervision and encouraging them to seek further support such as counselling or regular supervision, as appropriate.

## 6. Safer Recruitment & Selection of Staff

- 6.1. The University pays due regard to the safer recruitment practices detailed in 'Keeping Children Safe in Education' (KCSIE 2022) and has a formal [Recruitment Policy](#) that refers to this Policy.
- 6.2. The University's commitment to safeguarding is stated on all job advertisements and recruitment materials.
- 6.3. The University's recruitment process is robust in seeking to establish the commitment of candidates to support the University's measures to safeguard children and to identify, deter or reject people who might pose a risk of harm to children or are otherwise unsuited to work with them.
- 6.4. All staff working within the University who have substantial access to children have been checked as to their suitability, including verification of their identity, qualifications and a satisfactory barred list check, enhanced DBS check and a right to work in the UK.
- 6.5. The University's People Team maintains a central record of recruitment checks for audit purposes, as detailed in KCSIE 2022.
- 6.6. Any member of staff working in regulated activity with FE students prior to receipt of a satisfactory DBS check will not be left unsupervised and will be subject to a risk assessment.
- 6.7. Volunteers who are not working in regulated activity will always be supervised.

## 7. Staff Expectations

- 7.1. **All staff involved in the delivery of Further Education at the University:**
  - Have a duty and responsibility to safeguard children, young people and vulnerable adults studying FE courses, irrespective of their role.
  - Are responsible for familiarising themselves with this Policy, accompanying procedures and guidance and to be aware of the systems in place which support safeguarding.
  - Are responsible for identifying concerns early and providing help for children, young people, and vulnerable adults to prevent concerns from escalating to a point where intervention would be needed via a statutory assessment under the Children Act 1989; i.e., Section 17 (Children in Need) and Section 47 (a child suffering harm, or likely to suffer significant harm). These concerns should be discussed with either the Campus's DSL or DDSL.
  - Are expected to know how to contact the DSLs, DDSLs, and the Head of Student Wellbeing.
  - Will be trained in the process and principles for sharing information within the Campus which supports safeguarding and how to raise concerns.
  - Should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the campus and/or can occur between young people and vulnerable adults outside of these environments.
  - Should be alert to the fact that young people and vulnerable adults are at risk of abuse or exploitation in situations outside the home.
  - Are alert to signs and indicators of possible abuse and neglect or at risk of harm and be able to identify vulnerable students and take action to keep them safe. Information or concerns about children will be shared with the [Prevent Duty Policy](#) where it includes those:

- who need a social worker and may be experiencing abuse or neglect;
- requiring mental health support;
- who may benefit from early help;
- where there is a radicalisation concern;
- where a crime may have been committed;
- where there is the potential for peer-on-peer abuse/child-on-child sexual harassment or sexual violence.

**7.2. All University Staff will also:**

- Record concerns appropriately and in a timely manner, using CPOMS.
- Be aware of the need to raise to the Campus Management Team any concerns they have about safeguarding practices within their campus.
- Have the skills, knowledge and understanding to keep looked after children, previously looked after children, and vulnerable children and young people safe.
- Be aware of signs of abuse or neglect and the additional barriers to recognising abuse and neglect in children with Special Educational Needs and Disabilities (SEND) and those with relevant health conditions.
- Be aware of their legal responsibility to report cases of Female Genital Mutilation (FGM) to the police. Whilst all staff should speak to the DSL or DDSL about any FGM-related concerns, there is a specific legal duty on lecturers. If a lecturer, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, they must report this to the police (KCSIE 2021).
- Report their concerns to the DSL or DDSL if they think a student may be at risk of radicalisation or involvement in terrorism.
- Be aware that up skirting is now a criminal offence.
- Be aware of the University's [Staff Whistleblowing Policy](#).
- Promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children and young people, including where families may be facing challenging circumstances.
- Maintain an attitude of 'it could happen here' where safeguarding is concerned.

**8. Managing Allegations against Staff**

- 8.1. We acknowledge that a student may make an allegation against a member of staff. If such an allegation is made which meets the criteria as identified in Part 4 of Keeping Children Safe in Education, the member of staff receiving the allegation will immediately inform the Campus Dean, unless the allegation concerns the Campus Dean, in which case the Executive Management Group will be informed immediately.
- 8.2. The Campus Dean on all such occasions will discuss the content of the allegation with LADO, prior to undertaking any investigation.
- 8.3. A Case Manager will be assigned to investigate and will be guided by the LADO in all matters relating to the case, including suspension, sharing of information and any follow up investigation.
- 8.4. If a member of staff suspects that a student is being abused by another member of staff, a report should be made in confidence to the DSL or DDSL, who will liaise in the strictest of confidence with the Campus Dean and Head of People.
- 8.5. The University will follow the Department for Education and Local Authority procedures for managing allegations against staff.



## 9. Whistleblowing

- 9.1. The University recognises that students cannot be expected to raise concerns in an environment where staff fail to do so. All staff should be aware of their duty to raise concerns, where they exist, about the attitude or actions of colleagues using the University's confidential [Staff Whistleblowing Policy](#).
- 9.2. Whistleblowing concerns should be raised with the Campus Dean, unless the concerns are about the Dean, in which case they should be raised with the Executive Management Group.
- 9.3. Staff will be made aware that if they feel unable to raise a child protection failure internally, they can contact the [NSPCC whistleblowing helpline](#).

## 10. Guidelines for Dealing with Disclosures & Reporting Concerns

- 10.1. Any suspicion, allegation or incident of abuse must be reported to a member of the Student Support Team. If any member of staff has any concerns about a student they consider to be suffering or to be at risk of suffering significant harm, he/she must immediately contact a member of the Safeguarding Team.
- 10.2. Staff should not:
  - Promise confidentiality.
  - Ask leading questions.
  - Criticise or give their views.
- 10.3. The staff member to whom a disclosure is made should make a full and careful written record of the alleged abuse on CPOMS. This should be done immediately or as soon as possible thereafter and passed to the DSL or DDSL. The record must be kept secure and confidential. The relevant information should include:
  - The date and time the allegation was made.
  - Staff name and the names of others present.
  - The name of the person making the allegation and, where different, the name of the child who has allegedly been abused.
  - A description of any injuries observed.
  - An account of the allegation.
  - Any telephone report must be confirmed in writing to Social Services department within 24 hours. The confirmation may be handwritten or posted, but a copy must be kept securely on file.
  - The DSL or DDSL shall retain a copy of the written records and any other relevant material. These will be kept securely at all times, separate from the main student file.
- 10.4. Allegations against staff will be referred to the Campus Dean.
- 10.5. A member of the Student Support Team will discuss the situation with Social Services if appropriate. This will include advice and discussion as to whether to make a formal referral for child protection. There should be no contact with parents/carers by staff – any contact must have the consent of the person disclosing and be referred via Children's Services.

## 11. Types of Concerns

- 11.1. Staff should only discuss these types of concerns with a member of the Student Support Team:

- A student discloses that they have been sexually abused in the past or is now being sexually abused.
- A student discloses self-harm, eating disorders, or suicidal thoughts or attempts.
- A student has been physically abused in the past or is now being physically abused.
- Staff are told by another student or parent/carer that they know a student is being abused.
- Staff see bruises, cuts, burns or unexplained injuries that lead to suspicion of a physical injury.
- If they have any concerns about a student's welfare or safety.

## **12. Neglect or Emotional Abuse**

- 12.1. Members of staff often find it more difficult to know what to pass on in these circumstances. Any concerns or worries about a student's welfare should be discussed with a member of the Student Support Team.
- 12.2. It is important that staff alert the DSL or DDSL of concerns including, but not limited to:
- Lack of adequate food, clothes or hygiene.
  - Loss of weight.
  - Increase in apathy.
  - Excessive attention-seeking behaviour.
  - Unduly aggressive behaviour.
  - Self-depreciation (I'm stupid, ugly, worthless, etc).
  - Extremes of passivity or aggression.
  - Constant tiredness.
  - Untreated medical or hygiene problems.
  - No social relationships.

## **13. Suspected abuse by another student**

- 13.1. Any form of inappropriate behaviour (such as bullying and harassment) towards students will be dealt with under the University's [Staff Disciplinary Procedure/Student Disciplinary Procedure](#).
- 13.2. KCSIE requires staff to be vigilant around issues associated with sexual violence and sexual harassment between children in campuses. It also provides clarity on managing peer-on-peer abuse and additionally physical relationships between children.

## **14. Children Missing from Education**

- 14.1. A child going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding risks, including abuse and neglect, which may include sexual abuse or exploitation; child criminal exploitation; mental health problems; substance abuse and other issues. Early intervention is necessary to identify the existence of any underlying safeguarding risks and to help prevent the risk of them going missing in future.
- 14.2. The University must notify the Local Authority of any student who fails to attend regularly after making reasonable enquiries or has been absent without approval a continuous period of 5 days or more.
- 14.3. The University must also notify the Local Authority of any student under the age of 18 who is to be withdrawn because:

- They have been taken out of campuses by their parents and are being educated outside the campus system (e.g., home education)
- They have ceased to attend and no longer live within a reasonable distance (e.g., moved within the city, within the country or moved abroad but failed to notify of the change)
- Displaced as a result of a crisis e.g., domestic violence or homelessness.

14.4. To ensure compliance with the above, the University will:

- Hold two or more emergency contact numbers for each student.
- Attendance monitoring will be conducted closely with the DSL or DDSL and checked on an individual basis to ensure the safety of each student.
- Demonstrate that we have taken reasonable enquiries to ascertain the whereabouts of students that would be considered 'missing'.

## **15. Procedure and guidelines for student productions, film shoots and projects**

### **15.1. Risk Assessment**

15.1.1. An appropriate risk assessment should be made by the manager organising the event (e.g., Head of Events, Head of Estates, Head of Student Services) in every case, whether or not a child's participation is to be licensed by a local authority, to minimise the risks to children in relation to the activities they will be carrying out.

15.1.2. The risk assessment must pay particular attention to:

- the age, maturity and experience of the child, and the consequential lack of risk awareness.
- any exposure to chemical, biological, or physical hazard within the location.
- the nature and layout of locations, and additional facilities.
- the type of equipment and tools which the child is likely to come into contact with.

15.1.3. The following should be already considered as part of normal planning and risk assessing, although closer consideration should be applied where children are involved:

- First aid arrangements.
- Rest areas, toilet facilities, washing facilities and refreshment supplies.
- Emergency telephone numbers for children.
- Restrictions, terms, or conditions applied by the child's license.
- Arrangements for child chaperones, whether that be a parent/guardian, or a fully licensed professional chaperone.
- Travel arrangements for children, to and from locations.
- Talent Release Forms signed by the child's parent/guardian.
- Protection against inclement weather.

### **15.2. Working Hours**

15.2.1. The rules for working hours, rest breaks and meal breaks vary depending on the local government body which has issued the child's license. It should be noted that time spent in costume and make-up, as well as rehearsal periods, count as work. Working hours are counted from the moment a child arrives at the place of performance or rehearsal.

15.2.2. Student producers are responsible for logging child working hours, breaks, arrival and wrap times. This record, along with an accident report (if applicable), must be kept for 6 months following the child completing the production process. Authorities may ask to see this documentation.

15.2.3. Legislation states that a child taking part in a performance must not be employed in any other activity on the day of that performance, or the following day.

15.2.4. A child must have an overnight minimum break of 12 hours between attendance at a place of performance or rehearsal.

### 15.3. **Child Licensing**

15.3.1. A licence will ordinarily be required where a child is performing or participating in a production where the activity is manipulated or directed for the purpose of entertainment.

15.3.2. Chaperones are employed in a professional capacity to act in 'loco parentis', ensuring the wellbeing of any child working on a production, and to monitor compliance with the performance regulations and the terms of any child licences.

15.3.3. Detailed guidance can be found in [A Guide to Child Performance Licensing \(2020\)](#).

### 15.4. **Privacy and Consent Online**

15.4.1. Student producers are required to use a parental permission form to obtain consent for a child to be photographed and for the photographs to be used for promotional purposes. The form must clearly state the purpose(s) for which the photograph(s) will be used. Student producers should also obtain the child's permission to use their image.

15.4.2. Children's names must not be used in photograph captions. If a child is named, avoid using the photograph. Only use images of children in suitable clothing to reduce the risk of inappropriate use. Some activities, for example swimming, present a much greater risk of potential misuse.

15.4.3. Images or video recordings of children must be kept securely. Hard copies of images should be kept in a locked drawer and electronic images should be in a protected folder with restricted access.

15.4.4. Avoid using any personal equipment to take photos and recordings of children and use only cameras or devices belonging to the University.

## 16. **Record Keeping**

16.1. Any member of staff receiving a disclosure of abuse from a child or young person, or noticing signs or symptoms of possible abuse, will create a record on CPOMs as soon as possible (within the hour, if possible) recording exactly what was said, using the child's own words as far as possible.

16.2. All records of a child protection nature will be flagged to the DSL or DDSL, including (where applicable) case conference or core group minutes and written records of any concerns. Child protection records are kept securely and transferred in a safe and timely manner when a child changed College and a confirmation receipt obtained.

16.3. The DSL will maintain and regularly audit child protection records and ensure that each stand-alone file includes a chronology of significant events.

16.4. The DSL will liaise the People team to ensure up to date accuracy of the Single Central Record.

## 17. **Information Sharing & Confidentiality**

- 17.1. The University recognises that all matters relating to child protection are confidential and it is fully aware of the obligations which the Data Protection Act 2018 and UK General Data Protection Regulation (UK GDPR) places on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure. However, The Data Protection Act 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children.
- 17.2. The Campus Dean, DSL or DDSL will disclose any information about a student to other members of staff on a need-to-know basis only.
- 17.3. All staff must have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the GDPR. This includes:
- being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information, which is sensitive and personal, and should be treated as ‘special category personal data’.
  - understanding that ‘safeguarding of children and individuals at risk’ is a processing condition that allows practitioners to share special category personal data. This includes allowing practitioners to share information without consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner, but it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.
- 17.4. All staff must be aware that they have a professional responsibility to share information with other agencies to safeguard children/vulnerable adults. All staff must be aware they cannot promise a child/vulnerable young adult to keep secrets which might compromise their safety or wellbeing.
- 17.5. Wherever possible, DSLs and DDSLs will follow the principles of the GDPR, however this should not be a barrier to the effective and timely communication of information related to safeguarding information. Safeguarding information is treated as the ‘special category personal data and allow for storage and sharing sensitive and personal information through secure means.
- 17.6. KCSIE states that: *“Whilst, among other obligations, the Data Protection Act 1998 places duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure, this is **not** a barrier to sharing information where the failure to do so would result in a child being placed at risk of harm. Fears about sharing information **cannot** be allowed to stand in the way of the need to promote the welfare and protect the safety of children.”*
- 17.7. Further guidance is available on page 19 of the Government’s [Working Together to Safeguard Children](#) guidance, July 2018.

## 18. Monitoring & Evaluation

- 18.1. It is the responsibility of the Safeguarding & Wellbeing Committee to review and monitor safeguarding policies and procedures.
- 18.2. Within each campus, monitoring and evaluation will be carried out by the DSL or DDSL to review and monitor the procedures and to seek the advice of the Area Child Protection Committee and local authority Social Services and to amend procedures and guidelines as necessary.

18.3. This Policy and any associated procedures will be monitored and evaluated by:

- Completion of an annual safeguarding audit;
- Student surveys and questionnaires;
- Discussions with students and staff;
- Scrutiny of data and risk assessments;
- Scrutiny of the single central record of recruitment checks;
- Monitoring of logs of bullying/racist/behaviour incidents;
- Supervision of staff involved in child protection.

## 19. Other Relevant Policies

19.1. The University's statutory responsibility for safeguarding the welfare of children goes beyond basic child protection procedures. The duty is now to ensure that safeguarding permeates all activity and functions. This policy therefore complements and supports a range of other policies, where applicable, such as:

- [Bullying & Harassment Policy & Procedure](#)
- [First Aid Policy](#)
- [Health & Safety Policy](#)
- [Managing Allegations Against Staff Policy](#)
- [Online Learning Code of Conduct](#)
- [Prevent Duty Policy](#)
- [Recruitment Policy](#)
- [Sexual Misconduct Policy](#)
- [Staff Code of Conduct](#)
- [Staff Disciplinary Procedure](#)
- [Staff Whistleblowing Policy](#)
- [Student Charter](#)
- [Student Code of Conduct](#)
- [Student Data Protection Policy](#)
- [Student Disciplinary Procedure](#)
- [Student Equal Opportunities & Diversity Policy](#)
- [Student Social Media Policy & Guidelines](#)