

## 1. Principles and Scope

### 1.1 **If someone is at immediate risk of harm, call 999 immediately.**

1.2 This Policy explains our approach to providing a safe environment for our students to learn in and, where relevant, live. We have a common-law duty of care to ensure – as far as reasonably practicable – the provision of healthy and safe facilities and services for our students. This includes obligations under the Safeguarding Vulnerable Groups Act 2006, the Protection of Freedoms Act 2012, the Care Act 2014, and the Counter Terrorism and Security Act 2015. The guiding principles for providing a safe environment are:

- i) All individuals have a right to live protected from abuse. The Equality Act 2010 specifies protected characteristics including age, disability, gender (including gender reassignment), marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation. However, we also seek to provide a safe environment free from abuse based on language, culture, and physicality.
- ii) Safeguarding is a collective responsibility. This means that every student and member of staff has responsibility for acting in a way that does not harm or have the potential to cause harm to another member of the University. In addition, every student and member of staff has a duty to report all concerns about the welfare of our students.
- iii) British law places additional duties on us in relation to children, vulnerable adults, and the PREVENT duty. Our approach to safeguarding and supporting students, including in relation to our PREVENT duty, is underpinned by British values of democracy, freedom and autonomy, mutual respect, and the rule of law. The measures we have in place to safeguard and support our students are set out in our Academic Regulations and Policies, as well as this document.

1.3 In the event of any conflict between this Policy and any other of our Regulations and/or Policies, the following overriding principle from the [Information Commissioner's Office](#) applies:

**All University staff should do whatever is necessary and proportionate to protect someone's life. This includes being able to share personal data in an urgent or emergency situation to help prevent loss of life, or serious harm (whether physical, emotional, and/or mental). Staff and students acting in good faith in an urgent or emergency situation in the public interest will not be penalised.**

However, to minimise the possibility for ambiguity, this Policy sets out the expectations for staff and students in the most common and usual circumstances ([Wellbeing contact](#), [Under 18s](#), [Cause for concern](#), [Safeguarding](#), [Managing Security Threats](#)). This policy should be read alongside the Fitness to Study Policy.

1.4 This Policy applies to you if you are studying at Regent's University London campus. Our Collaborative Partners have their own individual systems in place for managing the types of risks addressed in this Policy.

## 2. Wellbeing Contact

2.1 During the admissions process, we ask you to provide details of your next of kin in case of the most serious circumstances, such as serious injury or death. Occasionally circumstances arise when we may need help from someone that you trust in relation to your wellbeing to prevent harm, and you may decide that the person you would want us to contact is not your next of kin. We therefore separately hold details of this person as your nominated wellbeing contact.

2. 2 Our standard approach is that we would only disclose your personal details to you, or to someone who has your permission to receive information about you, or to someone with a legal right to receive your personal data (e.g. the police, in relation to the detection or prevention of crime, or a doctor or paramedic, where there is a risk to your life). Students under 18 years old should read the section below on Under 18s regarding contact with a parent or guardian.

#### Likely Circumstances

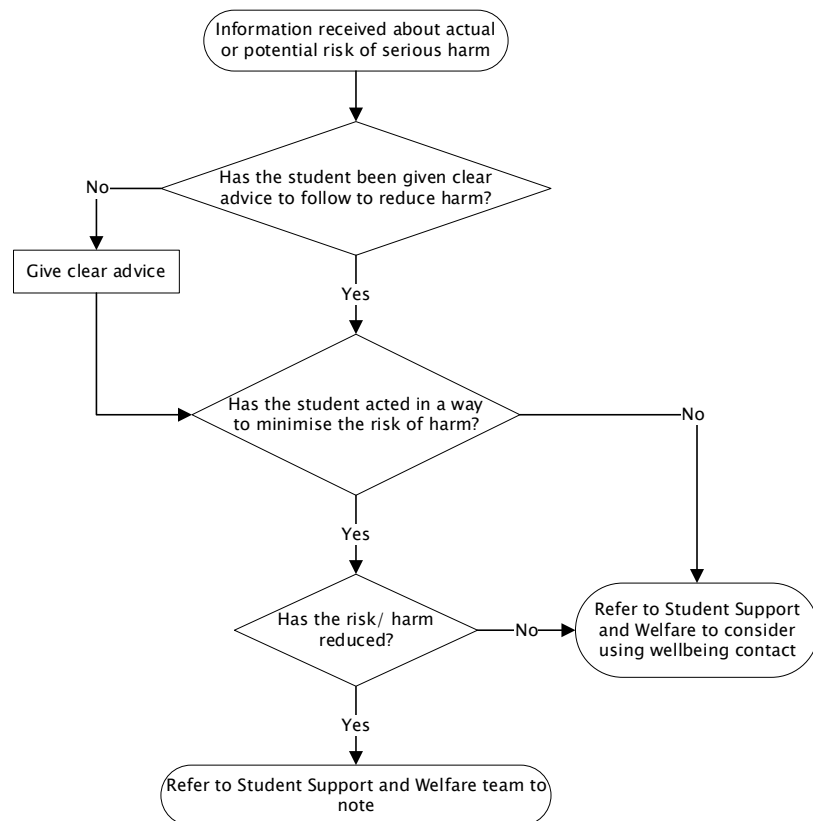
2. 3 We would use your designated wellbeing contact when our efforts to communicate with you have not worked, and we think that talking to someone you trust might help you. Including if:
- i) You are at risk but are not engaging with us or a relevant external agency or service (such as a paramedic, psychiatric expert, clinician) such that increases the risk to you.
  - ii) We think you are at risk of physical harm or exploitation.
  - iii) You are struggling with an aspect of university life but have not been able to remove yourself from a harmful situation. Examples include:
    - a) If you are showing signs of harmful addiction (e.g. gambling, legal/illegal substances).
    - b) You are being bullied, exploited, radicalised, or trafficked.
    - c) You have significant and sudden deterioration of your mental health, including suicidal ideation.
2. 4 The circumstances above are examples and do not represent an exhaustive list. A risk-based decision will be made before we use your wellbeing contact information, whether or not those circumstances are indicated above.

#### Choosing a wellbeing contact

2. 5 You may choose anyone you know and trust to be your wellbeing contact, including your next of kin. You may prefer to use a brother or sister, another relative or a trusted friend as your wellbeing contact. Just keep in mind that if we need to use your wellbeing contact, we may be sharing personal details about you, and may be contacting them by phone at any time of the day (or night, in an emergency). You will therefore need to ensure that your chosen wellbeing contact is comfortable that the University has their contact details and that we may contact them if a high risk is identified to your wellbeing.
2. 6 The contact details of your wellbeing contact are held securely within our student database, and would not be shared with third parties, except in the instances set out at paragraph 2.2 above. You may choose to amend your wellbeing contact at any point, by providing notice in writing.

#### The process

2. 7 The following flowchart offers guidance about how we make decisions about approaching your wellbeing contact:



#### Recording and monitoring use of wellbeing contacts

2. 8 The Student Disability and Wellbeing team keep a confidential record each time they use a wellbeing contact. Additionally, the Governance team is advised when a wellbeing contact is used as part of our compliance with GDPR.
2. 9 On an annual basis the Student Wellbeing & Disability team will report generic (anonymised) data to the Vice-Chancellor's Executive Team and the Learning, Teaching, and Student Experience Committee on the number of times wellbeing contacts for students have been used in the previous academic year. As a result of this monitoring, either the Vice-Chancellor's Executive Team or the Learning, Teaching, and Student Experience Committee may recommend changes to this Policy.

### **3. Young People (Under 18s)**

3. 1 Our campus, facilities, and services are an adult environment and we treat all our students as independent, responsible individuals, regardless of their age. We expect all our students to have the necessary skills to study and live independently without supervision, to conduct themselves as responsible members of the University, to comply with our rules, and to respect the rights of others.
3. 2 Applicants for study who will be under 18 years old at the time of their enrolment are referred to as 'young people' for the purpose of this Policy. Neither the University, nor any of our staff, act in the place of a parent or guardian (often known as '*in loco parentis*') in relation to young people regarding on, or off-campus activity.
3. 3 Adjustments to our standard approaches in relation to young people are outlined below:

#### Admissions

3. 4 We do not normally consider applications from young people for postgraduate study. For applications for undergraduate study, the following applies:  
For any applicant who will be under 18 on their expected first day of study or applying for their visa (as relevant), we require the parent(s) or guardian(s) to complete and return the [Under 18 Consent Form](#) to confirm they have read this

policy and understand the University's relationship with students under the age of 18 before a decision on the application can be finalised. All applications are assessed using our standard academic criteria.

3. 5 By signing the Under 18 Consent Form parent(s)/guardian(s) agree to provide us with up-to-date contact details - including a named contact - who can be contacted if an emergency situation arises or there are serious concerns for the health or wellbeing of the young person named in the consent form.

#### Communication

3. 6 Our approach is to communicate directly with students (including young people), not parents/guardians. However, any student may complete a Consent to Contact form which allows us to include a named parent or guardian in specific communication we send. A Consent to Contact completed for a young person will expire when they reach the age of 18 at which point a new form signed by the student would be needed.

3. 7 Prior to registration, the Admissions team will communicate with relevant staff, including, as standard, Security, about any young people accepted for study. Teaching and other staff will not routinely be made aware of a student's age unless there is good reason to do so (for example where the academic content of a course or modules may be triggering for a young person, where there are one-to-one meetings, or a trip is either a compulsory or optional part of the course of study). A current, enhanced DBS check will be required before a member of staff will meet one-to-one and/or attend a trip with a young person.

#### ID Cards

3. 8 Young people will have an ID card that distinguishes them from other students.

#### Students' Union

3. 9 Young people are encouraged to join Students' Union clubs and societies. However, their participation in certain activities may be restricted.

3. 10 Young people are not permitted to stand for or hold office.

#### Alcohol

3. 11 It is illegal for a young person to buy or be sold alcohol. Although we take reasonable steps to ensure that the law is upheld on licensed premises we control, we cannot supervise any individual student.

### **4. Cause for Concern**

4. 1 Early identification of students who may be struggling to cope with their studies and/or any other aspect of their life allows us to take prompt action to avoid, where possible, a situation escalating to crisis point. Common signs that indicate a cause for concern include:

- i) Indicators of significant stress or anxiety.
- ii) Sudden change in behaviour.
- iii) Poor attendance, often unexplained.
- iv) Failure to hand in work.
- v) Poor academic work or a reluctance to engage in activities.
- vi) Expressing views that indicate support for extremist or terrorist perspectives (as defined by the Government's PREVENT duty).
- vii) Direct disclosure by a student that they have a problem.

4. 2 Causes for concern are (broadly) urgent or non-urgent:

#### Urgent Cause for Concern

4. 3 Urgent causes for concern include where there is reasonable belief that a student is or may be:
- i) At risk of serious harm (whether from themselves or from others)

- ii) Carrying out violence (or threatening violence) to other people or property.
- iii) Out of touch with reality (disoriented and/or confused).
- iv) Abusing others.
- v) Homeless or have no safe place to live.

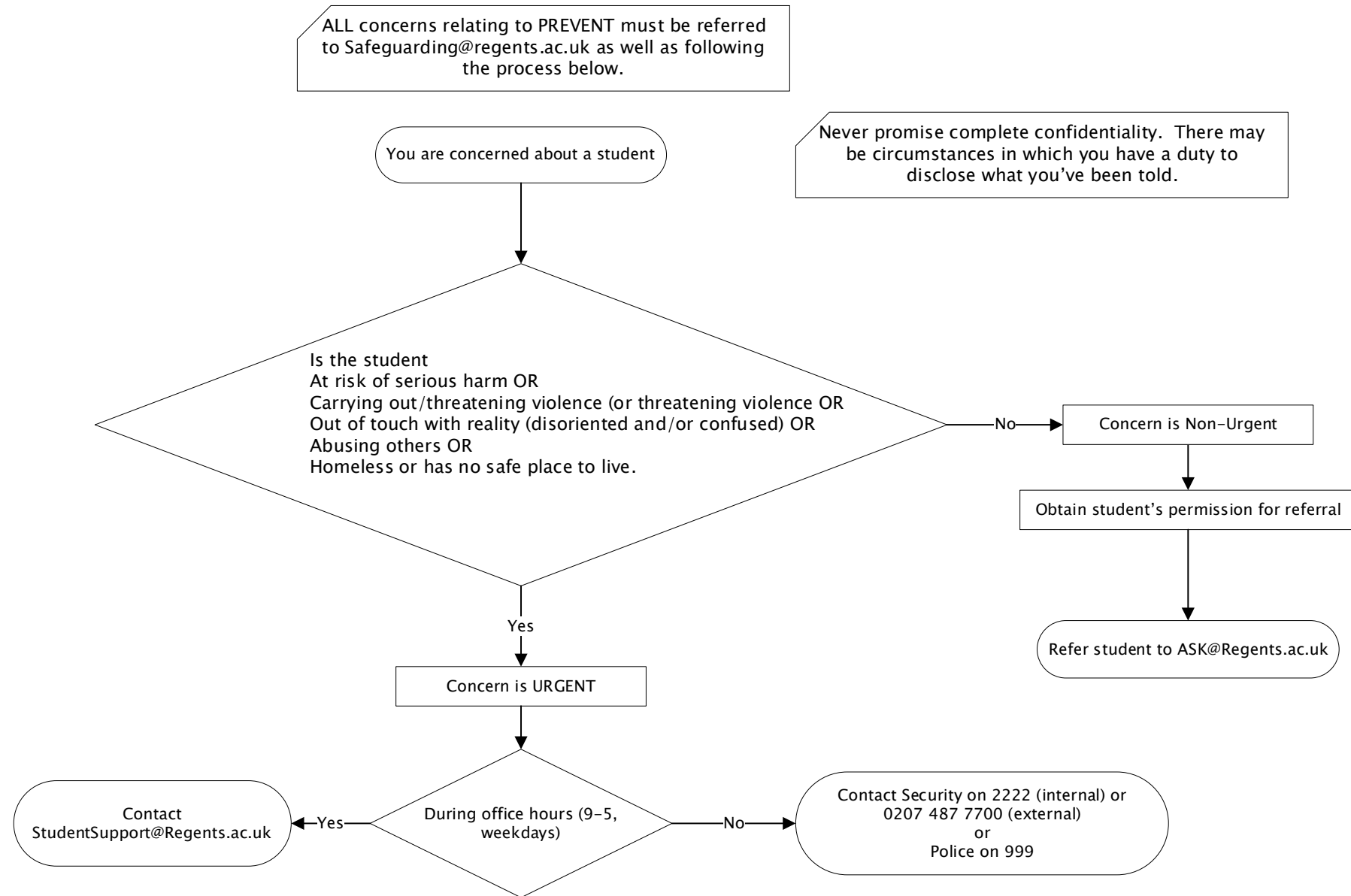
Non-urgent Cause for Concern

4. 4 Non-urgent causes for concern include where there is reasonable belief that a student is or may be:
- i) Depressed, anxious, or experiencing levels of stress that are causing physical symptoms.
  - ii) Having academic problems as a result of severe personal circumstances.
  - iii) Having relationship problems.
  - iv) Homesick, isolated, or lonely.
  - v) Experiencing grief.
  - vi) Having financial and/or housing problems.

Referral

4. 5 Students can contact the Student Wellbeing & Disability team through email ([wellbeingdisability@regents.ac.uk](mailto:wellbeingdisability@regents.ac.uk)) or through booking an appointment via CareerHub. Where a member of staff wishes to refer a student to the Student Wellbeing & Disability team they should have their permission to do so. The exception to this is where there is a credible risk of harm (to the student or to another) where the information should be shared immediately (see flow chart below).

Flowchart for Urgent and Non-Urgent causes for concern



## 5. Safeguarding

- 5.1 Safeguarding concerns may occur in relation to a member of staff or student who is or may be at risk of harm. Such 'Persons at Risk' can be either an adult (anyone over the age of 18) or a young person (anyone under the age of 18). Where relevant, the different approaches for an adult at risk or a young person at risk will be set out separately below.
- 5.2 We define 'harm' as:  
Any conduct which causes, or which could reasonably be foreseen to cause, pain, injury, fear, and/or distress.
- 5.3 Harm can be:
- i) Physical.
  - ii) Emotional.
  - iii) Psychological including radicalisation.
  - iv) Sexual.
  - v) Financial and material.
  - vi) Neglect including self-neglect.
  - vii) Discriminatory.
  - viii) Slavery.
  - ix) Organisational.
  - x) Domestic violence or Intimate partner violence.
- 5.4 It is not possible to guarantee confidentiality when a safeguarding concern is reported. This is because we have a duty of care to report specific concerns to a relevant authority.
- 5.5 All members of the University have a duty to report their concerns as soon as possible to a Designated Safeguarding Officer:
- i) Where the person at risk is a student, concerns must be reported to the Head of Student Experience and Welfare
  - ii) Where the adult at risk is a member of staff, concerns must be reported to the Director of HR
  - iii) In cases where the Designated Safeguarding Officer is unavailable, the member of staff should report their concern to the Major Incident Manager on call for that week (this can be done via contacting Regent's Security Team).
- 5.6 The following key information should be included when reporting a concern to a Designated Safeguarding Officer:
- About the person at risk
- i) Name.
  - ii) Gender.
  - iii) If a young person at risk, their age or date of birth.
  - iv) Factual account of the concern, including whether harm is actual or likely.
  - v) When the harm occurred and, if relevant, if it's still ongoing.
  - vi) What you have witnessed and what has been reported by a third party.
  - vii) Time, date and location of the incident(s) causing harm.
  - viii) Any other pertinent observations and/or information.
- About you, the person reporting a concern
- i) Name.
  - ii) Position.
  - iii) What action (if any) has been taken (including by third parties).
- 5.7 Designated Safeguarding Officers retain safeguarding reports confidentially and securely. These reports are disposed of in line with our Retention Policy.

## **6. Managing Security Threats**

6. 1 We recognise that the profile of some of our staff and students can result in increased security threats. To protect the safety and security of all our staff and students, we have in place an identity (ID) card system that functions as an access pass. Where we decide to suspend or cancel an individual's access, we will place a block on their access card. It is mainly for this reason that we require all individuals accessing our premises to either do so with an active and authorised ID access card, or to sign in with Reception. Anyone who does not have an active ID access card and who is not willing to sign in with Reception will be refused entry. All ID access card holders must be prepared to show their card to any member of the University staff who asks to see it: refusal may result in suspension from the premises.
6. 2 Local arrangements for managing known security threats may include:
- i) A system for checking in and out each day with Reception.
  - ii) A system for checking in and out each day with the relevant line manager.
6. 3 We recommend that all staff and students use their own personal safety system and equipment, for example downloading a mobile phone personal safety app such as Hollie Guard ([www.Hollieguard.com](http://www.Hollieguard.com)).
6. 4 Whilst on campus, any member of the University that feels:
- i) They are in immediate danger of harm, or threat of harm, should call the Police on 999.
  - ii) There is a threat of harm that is not immediate, should report these concerns to a member of the Security team.

## **7. Schedule A**

This Policy (set out above) applies to Regent's University London provision delivered directly at Regent's University London. Equivalent policies at our Collaborative Partners are detailed below:

### **DOMUS Academy**

7. 1 This does not apply to DOMUS students. LMA students should refer to DOMUS' Safeguarding Policy.

### **Istituto Marangoni (London)**

7. 2 This does not apply to IML students. LMA students should refer to IML's Safeguarding Policy.

### **Istituto Marangoni (Paris)**

7. 3 This does not apply to IMP students. LMA students should refer to IMP's Safeguarding Policy.

### **Liverpool Media Academy**

7. 4 This does not apply to LMA students. LMA students should refer to LMA's Safeguarding Policy.

### **MACROMEDIA**

7. 5 This does not apply to Macromedia students. LMA students should refer to Macromedia's Safeguarding Policy.