



Safeguarding Policy

v2 | October 2023

Our principles and Code of Ethics and Professional Conduct make it clear that we treat everyone with respect, we will not tolerate sexual misconduct, violence or abuse and we will take all reasonable steps to keep our campus and community safe. In this respect we consider that the same expectations apply to any members of the Forward College Community - Teaching Staff, Support Staff, Students, and any Interns or Contractors working with us for limited time periods.

We recognise that we have a fundamental responsibility to provide an environment in which individuals of all ages, whether staff, student, intern, or visitor, may work, learn and develop in a safe environment. This responsibility includes an ethical and moral duty to safeguard children and Adults at Risk at any time when they are engaging with our staff, students, interns and contractors in University-led activities, whether on or off of our campus. This core value is at the heart of our interaction with our wider community and acknowledges that in all our interactions with children and Adults at Risk, their welfare is of paramount importance.

This policy goes beyond the College's basic legal obligations and seeks to reflect general safeguarding guidance and good practice relating to the higher education sector.

1. The Purpose of this Policy

The purpose of this Safeguarding Policy and its associated guidance documents is to set out our responsibilities, processes and procedures and outline how we will:

- Provide a safe and supportive environment for our staff, students, interns, and contractors in the course of our work and university led activities.
- Provide a safe and supportive environment for children and Adults at Risk who engage with our staff, students, interns, and contractors in the course of our work and College led activities.
- Ensure that staff, students and interns who may come into contact with children and Adults at Risk have defined responsibilities.
- Ensure that staff, students and interns engaging with children and Adults at Risk receive relevant safeguarding training and understand their role and responsibilities.
- Ensure that there is a clear reporting and escalation route should staff, students or interns become aware of a safeguarding concern.

2. Scope

This Policy applies to staff, students, interns, and contractors engaging in College-led activity whether on any Forward College premises or elsewhere and covers our interaction with children and Adults at Risk who are current students, prospective students or who are otherwise participating in Forward College-related activities including our core activities of teaching and research, project-based learning, work-experience, internships, and outreach activities.

The policy provides guidance on our internal procedures, but acknowledges that it may be appropriate in certain circumstances to report safeguarding concerns about children or Adults at Risk to a range of external agencies.

The College recognises that young people can be at risk of being drawn into extremist ideologies which can lead to a risk of radicalisation. In the context of this Safeguarding Policy, the risk of being drawn into extremist ideologies and radicalisation is considered to be a significant safeguarding concern which is of equal weight alongside other forms of abuse and mistreatment of children and Adults at Risk.

In the event that the College-led activity is hosted by another organisation within their own facilities (such as the British Council, the Cité Internationale Universitaire in Paris, or the Factory premises in Berlin), the host organisation's Safeguarding Policy and related procedures will normally take precedence, but members of the College must also take note of, and act in accordance with the College's Safeguarding Policy to the extent that this is possible in the particular circumstances.

3. Definitions

Child: References to “child” or “children” in this policy means anyone under the age of 18 years.

Adult at Risk: The University bases its definition of an “Adult at Risk” on that used within the [Care Act 2014](#) drafted by the UK Government, and defines an Adult at Risk as someone over 18 years of age who

- (i) has needs for care and support; and
- (ii) is experiencing, or is at risk of abuse or neglect; and
- (iii) as a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it.

Safeguarding Children: In defining our approach towards children, Forward College draws on the definition used by the Department of Education of the UK Government in [Keeping Children Safe in Education 2023](#) (KCSE). While KCSE only applies to Schools and Colleges, and is only legally in force on UK territory, we will play our part in:

- Protecting children from maltreatment.
- Preventing impairment of children's mental or physical health or development.
- Ensuring that children are growing up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable all children to have the best outcomes.

Safeguarding Adults at Risk: While Forward College is not subject to the provisions of the Care Act 2014, the College draws broadly on this act to inform its policy on safeguarding Adults at Risk. We will play our part to:

- Ensure that the rights of Adults at Risk are protected to enable them to live in safety, free from abuse and neglect.
- Ensure that the wellbeing of the Adult at Risk is promoted and that in deciding on any action to be taken we will take into account their views, wishes, feelings and beliefs, for example when considering whether to refer concerns to statutory bodies or when seeking support from charitable organisations.

However we recognise that Adults at Risk sometimes have complex interpersonal relationships and may be ambivalent, unclear or unrealistic about their personal circumstances and may not fully appreciate potential risks to their safety or well-being and therefore it may not always be possible to fully defer to their wishes when seeking the best way forward.

Member of the College: Reference to a "Member of the College" includes staff, students, interns, contractors (for the duration of their contracted work on behalf of the college), and alumni of the College.

Staff: References to 'staff' include all remunerated College staff whether working on a permanent or temporary contract, interns (including student on remunerated student contracts), or engaged as "third party contract staff" working directly for the College.

Student: References to "student" includes all students registered with Forward College on any of its Degree Programmes.

Intern: References to "interns" includes all persons who have been offered non-remunerated roles in the College, regardless of whether the latter involve a

commitment by the College to cover accommodation and living costs. This includes Forward College students who hold part-time remunerated positions within the College.

Contractor: Contractors are employed by third party organisations to carry out work on behalf of the College. It is the responsibility of the contractor's employer to ensure that all necessary employment and safeguarding suitability checks are completed and to provide assurance to the College that this has been done.

“Work with children or Adults at Risk”: Within this policy “Work with children or Adults at Risk” includes all engagement with children and Adults at Risk whether in a professional capacity in connection with the work of the College, or in the course of other College-led activities supported by members of the College whether working in a paid or unpaid capacity.

4. Safeguarding children and Adults at Risk

We have a responsibility to provide a safe environment in which children and Adults at Risk can live, learn and develop. We understand that safeguarding and promoting the welfare of children and Adults at Risk is everyone's responsibility and we all have a role to play in protecting them in so far as we are reasonably able to do so within the context of a university environment and in relation to University-led activities.

Forward College recognises in particular the need for special care and close monitoring with any students who may register to begin study with the college before their 18th birthday.

The decision on whether to accept Adults considered ‘at risk’ lies entirely with Forward College, and will be determined by the personalised assessment of the specific individual circumstances of any person considered an “Adult at risk”. Only in cases where the College is satisfied that an “Adult at risk” can rely on adequate external support in addition to that provided by the College will provisional students be allowed to register with Forward College and study on campus.

(a) Responsibilities of the College Safeguarding Team

The Forward College Safeguarding Team is constituted by all members of the Wellbeing Team and Campus Managers in all our locations (Lisbon, Paris, and Berlin). The Wellbeing Coordinator is the Designated Safeguarding Lead (DSL).

The College Safeguarding Team has specific responsibility to promote good safeguarding practice and ensure that the College has a fit for purpose Safeguarding Policy and related procedures that are reviewed at least annually by the Senior Team and, if necessary, revised to meet evolving Regulatory requirements and relevant Best Practice Guidance.

The Forward College Safeguarding Team will:

- Ensure that the College Safeguarding Policy and accompanying procedures, advice and guidance are fit for purpose and sufficient to ensure that the College

meets its statutory obligations and complies generally with good practice and where reasonably possible, with safeguarding guidance issued by relevant statutory bodies concerned with such matters.

- Ensure that all teaching staff and support staff are aware of their duties under the present Safeguarding Policy and receive any assistance that they may require to arrange appropriate training and guidance on developing their safeguarding-related policies and procedures.
- Ensure that appropriate safeguarding training is available for members of the College who work with children and Adults at Risk, whether directly in the course of their work, or indirectly by being involved in the selection process of staff who do work directly with children and Adults at Risk.
- Ensure that that processes and procedures are in place for relevant recruitment checks and that these are conducted for all relevant roles that involve working directly with children and/or adults at risk. These procedures vary according to the country of operation and the country of origin / residence.
 - Wherever a staff member is a UK Citizen and/or resident, Forward College will request an [International Child Protection Certificate](#)
 - For overseas residents / citizens, Forward College will follow UK Government guidance on Criminal Record checks as released by the Home Office, available [HERE](#) , in conjunction with a request for checks in line with national legislation in the countries where Forward Campuses are located ([FRANCE](#) ; [PORTUGAL](#) ; [GERMANY](#) - specifically [Erweitertes Führungszeugnis](#)) or, where applicable, an international Criminal Record or one from the applicant's country of origin / current residence.
- Ensure that routes to report or escalate safeguarding concerns are clearly “signposted”, accessible and appropriately monitored.
- Ensure that reported safeguarding concerns are reviewed, specialist guidance sought and appropriate action taken to escalate internally and/or to the relevant external agency within statutory time frames.
- Prepare and submit referrals to Local Authority Children's or Adults Safeguarding authorities.

(b) Responsibilities of Academic and Professional Service Departments

In order to meet our safeguarding responsibility towards children and Adults at Risk under this policy, Academic and Professional Service Departments that work with children and Adults at Risk must ensure that appropriately trained staff are available and that procedures are in place to ensure that the department can comply with the College's Safeguarding Policy.

It is recognised that the level of engagement with children and Adults at Risk varies considerably between departments. Guidance on what arrangements would be appropriate in a range of particular circumstances is provided below, but departments should also seek advice from the Safeguarding Team.

Units that work with children or Adults at Risk must:

- Appoint a Department Safeguarding Contact (DSC). The College DSL may also act as the DSC.
- Ensure that financial provision is set aside to provide appropriately trained staff to support the department's work with children and Adults at Risk.
- Ensure that departmental staff, students, and interns who work with children and Adults at Risk, are selected or recruited in line with best practice and subsequently receive appropriate safeguarding training which is updated at least annually.
- Ensure that an appropriate Safeguarding Risk Assessment is carried out and that any actions identified by the risk assessment are completed before the activity commences. A Risk Assessment template and additional guidance is included in the supplementary information below.
- Ensure that departmental staff, students, and interns who work with children and Adults at Risk are familiar with safeguarding procedures to report and escalate safeguarding related concerns.

Additionally, units offering internship programmes must:

- Ensure that interns have an awareness of safeguarding and understand how to access support services within the College.
- Ensure that safeguarding training is provided for all members of College staff working with interns.

(c) Responsibilities of Individual Members of the Forward College Community

In line with the College's Code of Ethics and Professional Conduct we all have a duty to ensure that we treat everyone with respect, we should therefore report any concerns that we may have that children or Adults at Risk are being abused or mistreated and that children and Adults at Risk who engage with our staff, students and interns in the course of our work and College led activities, do so in a safe and supportive environment.

Individual members of the Forward College Community must:

- Ensure that children and Adults at Risk are treated with respect and supported whenever they engage in University led activity.
- Undertake appropriate safeguarding training before engaging in any College-led activity involving children or Adults at Risk.
- Ensure that they are aware of their responsibilities to safeguard children and Adults at Risk whether they are acting as a paid member of College staff or supporting College-led activity in an unpaid capacity, e.g. as an intern.
- Ensure that they are aware how to report a safeguarding incident or concern for activities involving children or Adults at Risk. Any member of the Forward College Community wishing to report an incident or concern should follow the

Safeguarding Concern Reporting Procedure when doing so, following guidelines in Annex 2 below.

5. Guidance

This policy provides the overall framework and statement of principles regarding the College's approach to safeguarding children and Adults at Risk. The accompanying documents provide detailed guidance on safeguarding roles, processes and procedures. Support and specific advice relating to the implementation and duties under this policy can be provided by the College Safeguarding Team and specifically the DSL.

Annex 1: Child Protection Policy

These pages contain information about the Forward College Child Protection Policy, the primary aim of which is to provide an environment in which those under the age of 18 are safe from harm. We also recognise the responsibility of other agencies to ensure the protection of children from harm. The Head of the Wellbeing Team is currently the Designated Safeguarding Lead (DSL).

Forward College Child Protection Policy

1. Forward College aims to provide an environment in which those under the age of 18 are safe from harm and recognises other agencies' responsibilities to ensure the protection of children from harm.
2. The key terms of reference for the Forward College Child Protection Policy are provided by the [UN Convention on the Rights of the Child](#) and the [Guidance on Working Together to Safeguard Children](#) (UK Government Department for Education, 2015 / 2023). The latter states that:
 - everyone who works with children has a responsibility for keeping them safe
 - everyone who comes into contact with children and families has a role to play in sharing information and identifying concerns.
3. This policy is coordinated by the Head of Wellbeing and Safeguarding, who is also the Designated Safeguarding Lead (DSL), to whom any questions about the policy or its operation should be referred: marucia.bardagi@forward-college.eu
4. The policy does not cover external contractors.
5. It is the responsibility of the organiser(s), whether members of the College or external bodies or individuals, of any activities, events or conferences involving under 18s which use College facilities or involve Forward college Staff, to make all the necessary child protection arrangements in connection with such activity including:
 - Undertaking an appropriate risk assessment
 - Ensuring that all staff are properly trained and briefed, including on procedures for dealing with concerns about child safeguarding
 - Seeking appropriate levels of safety checks for all staff involved, in conjunction with the Wellbeing and Safeguarding Team (see above, Safeguarding Policy § 4a and 4c)
 - Ensuring appropriate insurance arrangements are in place
6. The admission of a student under the age of 18 (at the point of admission) to a course of study at the College will require the respective Campus or Campuses to

ensure suitable arrangements are in place prior to the student enrolling. Admitting a child who is under the age of 16 on entry will be considered on a case-by-case basis with the final decision to admit being made by the President (or designated authority) and only after full consideration of the individual circumstances.

7. A brief guide for all staff on how to respond if a child or young person begins describing possible harm to you is included in the Safeguarding Reporting Process Guidance (see Annex 2 below)

8. Any child safeguarding concerns, disclosures or allegations of abuse shall be reported immediately to the University's Safeguarding team via e-mail to marucia.bardagi@forward-college.eu. See below, Annex 2, for the details of the procedure to follow.

9. It will be the responsibility of the College's Safeguarding team to maintain an accurate record of all concerns raised and action taken.

10. Additional provision for the safeguarding of Children can be drafted at any point in time, as relevant, should the need to do so occur. Responsibility for determining the need of additional and/or more detailed policy lies with the Wellbeing and Safeguarding Team.

11. Where research is to be undertaken which involves under 18s, specific ethical considerations apply and these will be considered through the normal processes for the ethical approval of research projects. Consideration should be given as to whether associated background checks, risk assessments and safeguarding training should be undertaken.

12. Where a student under the age of 18 is admitted to the College, Forward College is responsible for protection and support on Forward College premises and all activities directly linked to their course of study. Responsibility for safeguarding in student residences lies with the relevant student accommodation provider. In such cases, members of the Wellbeing and Safeguarding Team are however expected to liaise closely with the provider to ensure all due precautions are taken.

13. With respect to individuals described under items 11 and 12, Local Campus Managers will develop appropriate and pragmatic measures in consultation with the Designated Person and all relevant teaching and support staff to ensure that the responsibilities outlined under item 5 are satisfied.

14. Forward College reserves the right to offer paid part-time employment to its students as need and interest arises. In no circumstances will any employment be offered to students who are below the age of 18 years.

Annex 2: Safeguarding Concern Reporting Procedure

Any member of the Forward College Community (Staff, Student, Intern) is able to report an incident or concern relating to an adult at risk, child or young person under 18.

Please note that safeguarding concerns should only be reported to the safeguarding team if the person affected falls under one of these categories. For alternative cases that may involve a disciplinary issue, please refer to the relevant policy on Disciplinary Action.

Any concern about Safeguarding ought to be reported confidentially to the Head of the Wellbeing Team at Forward College, who is also the Designated Safeguarding Lead (DSL), by email: marucia.bardagi@forward-college.eu

Please include details of the following:

- **student name**
- **email address**
- **date of the reported concern**
- **detailed description of your concern / situation, including relevant date of the incident**
- **description of any action taken to date**
- **any further comments**

The information shared with the DSL will be used solely to support the College's Safeguarding and Child Protection Policy

All information supplied will be treated in accordance with the College's [MEMO on Wellbeing Protocol and Student Confidentiality](#) . Where necessary, the College will, at the behest of the DSL, inform the guardian / parent / next of kin immediately of any incident.

Annex 3: Risk Assessment Template

Name and job title of person writing this risk assessment:			
Date risk assessment created:		Date of review:	
Main contact for the activity (if different from the above):			
Event/Activity Name:			
Event/Activity Description:			
Date of event/activity:			
Location:	Campus:		
	Building:		
	Room:		
Location Offsite:	Name and address:		
Online	Platform name:		

Attendee Information

Number of attendees between 0 - 2 years		Number of adult attendees:	
Number of attendees between 2 - 3 years		Number of staff/students/interns:	
Number of attendees between 4 - 8 years			
Number of attendees between 9 - 12 years			
Number of attendees between 13 - 18 years			

When considering potential hazards and how they may cause harm, you should refer to the Safeguarding Risk Assessment Guidance.

Hazards and how they may cause harm	Who may be at Risk?	Existing Control Measures	Current Risk Level (VL,L,M,H,VH)	Where current risk is M, H or VH, what additional Control Measures are required?	Action required by whom & by when?	Final Risk Level
Health and Safety risks						
Physical space						
Online Safeguarding risks						

Staffing: ratios, recruitment, training, briefings, escalation						
Inappropriate contact						
Arrivals/Departures Participants getting lost/going missing						
Emergencies/escalation: first aid, allergies, dietary requirements.						
Department/event specific risks						

Events/activities should not be carried out until the assessment is completed and all required control measures are in place.

Overall Final Risk Rating (Highest level in final column above)		

Additional Comments from Risk Assessor (e.g. funding or practical implications)	
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	Severity				
Likelihood	Superficial	Minor	Serious	Major	Extreme
Unlikely	Very low	Very low	Low	Low	Moderate
Possible	Very low	Low	Low	Moderate	High
Likely	Low	Low	Moderate	High	Very high

Very likely	Low	Moderate	High	Very high	Very high
Extremely likely	Moderate	High	Very high	Very high	Very high

	Risk Level
Very low	Acceptable risk - no action required
Low	Tolerable risk - further control measures not required, but status must be monitored
Moderate	Further control measures required to reduce risk as far as is reasonably practical
High	Urgent action required to allow activity to continue

Very high	Risk intolerable - activity must cease until the risk has been reduced

