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GBS Safeguarding Policy

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Related policies
▪ GBS Data Protection Policy ▪ GBS ICT Policy ▪ GBS IT Usage Policy ▪ GBS Student Charter ▪ GBS Code of Ethics and Standards ▪ GBS Student Disciplinary Policy

External Reference
1. The General Data Protection Regulation (EU) 2016/679 (GDPR) controls how your personal information is used by organisations, businesses, or the government.

Contents

GBS HE Malta Limited Safeguarding Policy

1. Introduction

1.1 This policy is designed to provide a clear framework to structure and inform GBS HE Malta Limited (GBS) response to safeguarding concerns for students and staff who may be vulnerable to any form of abuse including messages of extremism.

1.2 GBS promotes a multicultural environment where respect for, and tolerance of, other people's beliefs are respected. GBS aims to provide a safe, inclusive environment, conducive to work, learning, scholarly activity, and the enjoyment of a positive experience to all at GBS.

1.3 This policy applies to all students and staff employed by GBS and others associated with GBS. Article 3 of the European Convention on Human Rights and Article 36 of the Constitution of Malta also grant every person protection against inhuman or degrading treatment or punishment. It thus follows that any administrative or legislative measures in this field, must also aim at protecting children from abuse.

1.4 This policy outlines GBS commitment to preventing staff and students from being drawn into terrorism. In doing so we recognise that terrorism can be associated with a range of ideologies. This policy seeks to safeguard students and staff from violent extremism in the name of ideology, or belief, whilst at the same time protecting freedom of speech and embedding a commitment to the promotion of positive learning and community relations.

1.5 This policy is written with reference to the European Union Combating Terrorism (Directive 2017/541), and to the guidance issued by the European Commission related to the Prevent Duty. The Directive places a duty on Higher Education institutions to have 'due regard to the need to prevent people from being drawn into terrorism'. It is further noted that institutions must seek to balance this duty with their commitment to freedom of speech and the importance of academic freedom.

1.6 The GBS Safeguarding Policy provides for the three key areas of prevention, protection, and support for both students, staff and others associated with GBS across all its campus locations.

2. Aims

2.1 This policy is specifically designed to:
   - Foster a culture of trust between adults who work at GBS and those who attend it.
   - Prevent people who pose a risk of harm from working with 'at risk' adults.
   - Ensure staff receive appropriate safeguarding training which is regularly updated.
   - Ensure staff are effective in providing 'early help.

2.2 Staff should be aware of and be able to effectively respond a range of issues. The list given below is not intended to be exhaustive but is indicative of the types of issues that might lead a person to be deemed as 'vulnerable':
   - Honour-based violence.
   - Peer to peer bullying and self-harm.

- Mental health issues.
- Online risks.
- Physical abuse, which includes hitting, slapping, pushing, kicking, rough handling or any other unnecessary or unwarranted physical force.
- Sexual abuse.
- Psychological abuse, which includes emotional abuse, threats of harm, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment and verbal abuse.
- Financial or Material abuse which includes exploitation, misuse, or misappropriation of property, theft, and fraud.
- Discriminatory abuse, which includes racist, sexist and abuse based on disability.

3. Key Definitions

3.1 Prevent of radicalisation is the anti-radicalisation agenda embedded in the European Union Combating Terrorism (Directive 2017/541) and called Prevent in this policy (https://home-affairs.ec.europa.eu/policies/internal-security/counter-terrorism-and-radicalisation/prevention-radicalisation_en) . Key definitions include:

- **Extremism:** vocal or active opposition to fundamental values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.
- **Non-Violent Extremism:** is extremism, as defined above, which is not accompanied by violence.
- **Radicalisation:** the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- **Terrorism:** an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious, or ideological cause.

3.2 **Vulnerability** is a situation where a person is at risk of exploitation, harm, or abuse. A person may join GBS already vulnerable, or can become vulnerable because of specific circumstances, which may increase the risk of them experiencing exploitation, harm or abuse or being radicalised.

4. Principles

4.1 GBS is committed to ensuring vulnerable individuals are safeguarded and from being drawn into terrorism or related activities.

4.2 GBS will seek to identify, protect, and support individuals who it believes may be at risk of abuse of any kind and/or being drawn into terrorism, where such actions do not infringe an individual's privacy and The General Data Protection Regulation (EU) 2016/679 (GDPR).

4.3 GBS discharges this responsibility in partnership with other agencies, including the Police, Local Authorities, and the network of regional Prevent Co-ordinators in Malta.

4.4 The policy sets what is allowed and what is prohibited on GBS premises, across all its campuses, and in the use of GBS internet and IT equipment.

5. Responsibilities

5.1 Responsibility for ensuring Prevent Duty lies with the GBS Director of Operations.

5.2 Responsibility for the Safeguarding Policy, prevent risk assessment and action plan lies with the Director of Operations supported by the Campus Leads. Their duties are to ensure delivery of an effective risk assessment/ action plan and up to date policy that fully comply with and meet the Prevent requirements.

5.3 It is the responsibility of all GBS staff to be aware of GBS Safeguarding Policy and associated documents. Staff will be provided with training and briefings. All staff should be familiar with GBS' procedures and protocols for safeguarding the welfare of students and young people. Staff have a duty to report any student protection of welfare concerns to the GBS Malta Director of Operations.

6. Risk Assessment and Action Plan

6.1 GBS will undertake a risk assessment to identify potential risks associated with students being drawn into extremism or terrorism. Based on the risk assessment and any identified concerns, an appropriate action plan will be developed to identify risks and any actions that may need to be taken to mitigate those risks.

7. Working with Partners and Information Sharing

7.1 GBS will make and maintain contact with the local police/ local authority Prevent coordinator as appropriate to understand their roles and the support available. Contact with local authorities in Malta will help GBS to ascertain other useful local agencies to work with. GBS will share information with local organisations, as appropriate. GBS may also share specific information about an individual or a group of individuals engaged in any actual or suspected unlawful activity. In reaching a decision to share information with third parties, GBS will adhere to its Data Protection Policy and take any decision in the context of GBS Freedom of Speech Policy.

8. Training and Referral Procedure

8.1 The key members of staff will be given training or workshops to ensure staff understand this Safeguarding Policy, Prevent Duty requirements and associated procedures. Training and workshops for GBS staff will involve:

- The context and expectations of Safeguarding and the Prevent Duty
- The duties and responsibilities of GBS, its staff and students.
- Referral procedures for suspected cases of abuse and/or extremist behaviour
- Definitions of terminology and how to identify vulnerable individuals and risks of extremism and terrorism.
- Understanding the importance of their own behaviour and professionalism and not discussing inflammatory subjects with students within the context of GBS' Freedom of Speech Policy.
- Making student Course Representatives and the wider student body of Prevent and

GBS' Safeguarding Policy and associated procedures. This will include:
- understanding terminology
- importance of maintaining a supportive, respectful, and tolerant culture in GBS
- requirements for students to report any concerns and/or incidents.

8.2 If any member of staff or student is concerned about another staff member or student or group of students, they must contact the appropriate Programme Administrator. Concerns about staff or students will be referred to the Director of Operations (GBS' Lead Safeguarding and Prevent Officer.)

9. Signs that may cause concern

9.1 The following provide some guidance to behaviours, language, events, and material that may cause concern regarding terrorism and extremism:

- Students talking about exposure to extremist materials or views outside GBS (in this event, information must be shared with relevant local authorities)
- Changes in behaviour, for example, someone becoming isolated
- Fall in standard of work, poor attendance, disengagement from studies
- Changes in attitude, for example, to intolerance of differences and/or having closed mind about matters such as beliefs or ideology
- Asking questions about topics connected to extremism or terrorism
- Offering opinions that appear to have come from extremist ideologies
- Attempts to forcefully impose own views/ beliefs on others
- Use of extremist vocabulary to exclude others or incite violence
- Accessing extremist material online, via social network sites, etc.
- Overt new religious practices
- Drawings or posters showing extremist ideology/ views/ symbols
- Voicing concerns about anyone. Please note that any concerns relating to a person under the age of 18 are Safeguarding issues and should be dealt with according to the GBS Safeguarding Policy.

10. Counteracting Risk

10.1 The following provide some guidance to how risks of extremism and/or terrorism may be counteracted at GBS:

- Promoting a safe and supportive learning environment through providing clear expectations of accepted behaviours and those, including radicalisation and extremism, that will not be tolerated
- Promoting core British values through information given to students, notices displayed around the GBS's campuses, examples set to students by staff, and in classes and discussions that include education about British culture, traditions, beliefs, and tolerance.
- Where appropriate, developing critical awareness and thought to counter accepting extremism without question, especially of online material.

- Challenging radical or extremist views in any context, formal or informal, following stated procedures and reporting duties, as laid out in this GBS Prevent Policy.
- Being ready to react when local, national, or international events cause upset; being aware of the likelihood of conflicting feelings being expressed, and alert to potential acts of recrimination.
- Having strong filters on GBS's internet and IT equipment together with clear rules on accessing extremist websites, as well as the use of social networks to exchange extremist views.
- Ensure that extremist speakers do not use GBS premises to distribute material or expound views
- Getting to know our students and guests, their home circumstances and friendship groups. Through knowing students well, it is easier to spot changes in behaviour.
- Being observant and vigilant in noticing any signs of radical or extremist behaviour
- Working hard to support any students identified as vulnerable and at risk and reporting using the guidelines provided in GBS's Prevent Policy.

11.   Guidance for safer working practices

11.1 All adults who work with students and young people have a crucial role to play in shaping their lives. They have a unique opportunity to interact with students and young people in ways that are both affirming and inspiring. This guidance has been produced to help staff establish safe and responsive environments which safeguard young people and reduce the risk of adults being unjustly accused of improper or unprofessional conduct. This means avoiding any conduct which would lead any reasonable person to question the motivation and intentions

11.2 Staff should remember that their behaviour has a significant impact on the students, and they must therefore adopt a professional approach to all aspects of their work; this includes dress, communication, and social contact.

11.3 If in doubt staff should discuss any uncertainties or confusion with their line manager.

11.4 Similarly, if staff feel that an incident could be misinterpreted, they should document it and report immediately to a senior member of staff.

12.   The Use of Internet and IT facilities

12.1 In using GBS IT services, equipment, and internet all members of staff, students and guests are required to adhere to GBS's ICT Policy. It is forbidden to use the GBS's website, internet, IT facilities, or other elements of the information management systems or processes for material that is illegal of offensive, and the instigation, promotion or planning or execution of violent or non-violent extremism, radicalisation, or terrorism in the name of ideology or belief.

12.2 GBS reserves the right to ask students or members of staff to remove from the GBS's IT platforms or premises any illegal and/or offensive material and/or material encouraging engagement with violent or nonviolent extremism, radicalisation, or terrorism related activities

13. Access and Control

13.1 The following guidance is provided for GBS students, staff and guests concerning access and control in the context of this Safeguarding Policy:

- Events hosted by students may be permitted provided they do not break the law or breach the lawful rights of others e.g., using threatening, abusive, or insulting words or behaviour, particularly with a view to incite hatred or draw others into terrorism. Any student society, group of students or individual student wishing to host such an event must first contact the campus GBS Safeguarding and Prevent Officer Lead.
- If a member of staff and/or student (or group of students) wishes to invite an external speaker onto GBS premises, at any of its campuses, they should complete the External Speaker Approval Form and obtain approval from the campus GBS Prevent Lead. In doing so, at least 14 days advance notice of the planned event must be given. Annex 1 provides the template for requesting approval for an external speaker onto GBS premises.
- External bookings for GBS to host conferences, hospitality and academic speakers will be treated in the same way, thus ensuring that the GBS knows at all times who is on campus and why.
- Any contentious or security issues that might affect the safety of staff or students or the reputational integrity of the GBS must be referred to the GBS Safeguarding and Prevent Officer Lead for the campus.

14. Understanding Terminology

14.1 The glossary of terms has been sourced from the Prevent Strategy 2011 (https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/97976/prevent-strategy-review.pdf).

- **Extremism** is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.

- **Radicalisation** refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.

- **Vulnerability** describes the condition of being capable of being injured; difficult to defend; open to moral or ideological attack. Within Prevent, the word describes factors and characteristics associated with being susceptible to radicalisation

- An **ideology** is a set of beliefs. An ideologue is a proponent as well as an adherent of an ideology

- The current UK definition of 'terrorism' is given in the Terrorism Act 2000 (TACT 2000). In summary this defines terrorism as an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a

political, religious, or ideological cause (the definition has been sourced from the Revised Prevent Duty Guidance: for England and Wales https://www.gov.uk/government/publications/prevent-duty-guidance).

15. The General Data Protection Regulation (EU) 2016/679 (GDPR)

15.1 The information provided will be processed in accordance with the relevant General Data Protection Regulation principles and this information will only be disclosed when GBS is in receipt of a formal, legitimate request.

16. Monitoring and Review

16.1 This policy may be amended by GBS at any time. The risk assessment and associated action plan will be updated on an annual basis. This will be considered and approved by Academic Board and considered by Executive Board.

17. Alternative Format

17.1 This policy can be provided in alternative formats (including large print, audio and electronic) upon request. For further information, or to make a request, please contact:

- **Name:** Student Welfare Management Team
- **Position:** Student Welfare Officer/Mana