

Hult International Business School Safeguarding Policy

August 2025
London and Dubai Campuses

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1. Introduction

Hult International Business School offers undergraduate, postgraduate and executive education programs to an international student body. We have a global campus network which allows our students to study in a range of locations all over the world.

Hult International Business School Inc. is a 501 (c)(3) non-profit organization in the Commonwealth of Massachusetts. Hult International Business School Ltd. is a UK registered charity with the Charity Commission in England and Wales, Charity number: 1092321. The Ashridge (Bonar Law Memorial) Trust is also a UK registered charity with the Charity Commission in England and Wales, Charity number: 311096. These are all separate legal entities that have merged operations under the common brand “Hult International Business School”.

We recognise that to provide a safe and supportive environment, we must place wellbeing and safeguarding at the heart of all our actions and thoughts. We are committed to working together with statutory services and wider partners to ensure safeguarding remains a priority in the delivery of our business school.

This policy and the supporting operational procedures seek to ensure that Hult International Business School undertakes its responsibilities regarding the safeguarding of all staff (including temporary staff), students, faculty, and student volunteers.

This policy establishes a framework to support all those who encounter Hult International Business School, protect them from abuse, harm and maltreatment of any kind and clarifies the organisation’s expectations.

2. Scope and Purpose of the Policy

This policy and the associated procedures seek to ensure that Hult International Business School undertakes its responsibilities to safeguard people consistently and effectively.

This policy applies to all aspects of Hult International Business School (London and Dubai Campuses). The policy and supporting procedures apply to all trustees, staff (including temporary staff), students, faculty, and student volunteers.

Hult International Business School acknowledges its duty of care to safeguard and promote the welfare of children and the wellbeing of adults and is committed to ensuring safeguarding practices reflect statutory responsibilities, government guidance and comply with best practice standards as a non-profit educational organisation.

Hult International Business School understands its Common Law Duty of Care and responsibilities as an employer,¹ takes all reasonable steps to ensure the safety of people involved in any activity or interaction for which the organisation is responsible.

This policy's purpose is to ensure that all faculty, staff, and learners have a positive experience of the school through the services, support, or activities they engage in.

Our approach to safeguarding people will align with the key principles of the European Convention of Human Rights, the Human Rights Act 1998, and the Equality Act 2010, which apply to UK, as well as the European Convention of Human Rights, the UAE Constitution, Federal Laws, and the UAE Anti-Discrimination Law, which apply to the UAE.

- Everyone has the right to live their lives free from coercion, intimidation, oppression and physical, sexual, emotional, or mental harm.
- Everyone has the right to a family life and privacy.
- Everyone has a right to confidentiality in respect of personal information, where this does not infringe the rights of other people.
- Everyone has the right to receive full and comprehensive information, which allows them to make informed choices about their circumstances.
- Everyone has the right to the protection of the law and full access to the judicial process and criminal justice system.

Practising these principles means we are committed to the principle that protecting a person at risk of abuse or neglect should be everyone's paramount concern.

All our staff (including temporary staff), faculty and student volunteers working for or delivering services on behalf of Hult International Business School have an ethical and professional duty of care to act if they:

- witness abuse
- receive information about abuse, suspected abuse or concerns about the care or treatment of a person at risk of abuse or neglect, or
- have concerns or suspicions about possible abuse or inappropriate care.

This safeguarding policy and supporting procedures, including criminal investigations, override other organisational procedures such as disciplinary action and complaints.

2.1 *Hult International Business School Safeguarding Statement*

Safeguarding is Everyone's business – Hult International Business School is committed to safeguarding and promoting the wellbeing of all individuals and expects all trustees,

¹ [Health and Safety Executive – Workplace health, safety and welfare](#)

staff, students, faculty and student volunteers to understand their responsibilities and share this commitment.

2.2 Hult International Business School's Modern Slavery Statement

Hult International Business School has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in all its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in its own business or in any of its supply chains. For more information, see [here](#)

3. Breach of Policy and Procedures

Failure to adhere to this policy and associated procedures could lead to disciplinary action, including dismissal, for the staff employed by Hult International Business School. Suppliers, consultants, and contracted staff may also have their relationship with the organisation terminated. Hult International Business School volunteers may also be subject to action by the organisation.

4. Definitions

An adult is a person aged 18 (UK) and 21 (UAE) and over, and a child is a person under 18 (UK) and under 21 (UAE).

Safeguarding Adults means protecting an adult's right to live safely, free from abuse and neglect.

An Adult at Risk of Abuse or Neglect, in the UAE, is guided by general protections under the Penal Code, Disability Rights Law (Federal Law No. 29 of 2006), and anti-trafficking legislation. As outlined in the Care Act 2014,² (UK only), an **Adult at Risk of Abuse or Neglect** is an adult who:

- a. has needs for care and support because of mental or other disability, age or illness; whether or not the Local Authority is meeting any of those needs; and
- b. is experiencing or at risk of abuse or neglect; and
- c. as a result of those care and support needs is unable to protect themselves from either the risk, or the experience of abuse or neglect.

The threshold for eligible '**care and support**' is based on identifying how an adult's needs affect their ability to achieve relevant outcomes, and how these needs impact their wellbeing. If an

² [Care Act 2014](#)

adult has a physical or mental impairment or illness and they are unable to achieve at least two of the following **‘nine aspects of wellbeing’**, and as a consequence of being unable to achieve one of the outcomes there is or is likely to be a significant impact on the adult’s wellbeing then they are eligible for care and support by their local authority.

Nine Aspects of Adult Wellbeing:

- personal dignity (including treatment of the individual with respect)
- physical and mental health, and emotional wellbeing
- protection from harm, abuse and neglect
- control by the individual over day-to-day life (including over care and support provided and the way it is provided)
- participation in work, education, training or recreation
- social and economic wellbeing
- domestic, family and personal relationships
- suitability of living accommodation
- The individual’s contribution to society

If the adult fits the definition of an **‘Adult at Risk of Abuse or Neglect’**, the local authority is required by law to conduct enquiries or to ensure that enquiries are made; these are referred to as **‘Statutory Safeguarding Enquiries’**, outlined in Section 42 of the Care Act (UK only)

Vulnerable Adult may include individuals with learning disabilities, mental health issues and people with a physical disability or impairment. It may also include adult victims of domestic abuse, self-neglect, sexual exploitation, criminal exploitation, hate crime, honour-based violence, and anti-social behaviour.

An adult’s need for additional support to protect themselves may be increased when complicated by additional factors, such as controlling and coercive behaviour, physical frailty or chronic illness, sensory impairment, challenging behaviour, drug or alcohol problems, social or emotional problems, or poverty or homelessness. It is important to note that vulnerability can fluctuate.

Many adults may not realise that they are being abused and/or exploited, particularly where there is an abuse of power, a dependency, a relationship, or a reluctance to assert themselves for fear of making the situation worse.

Local authorities will decide to make safeguarding enquiries for an adult who does not fit the Section 42 criteria but is vulnerable. These enquiries are not required by law and are often referred to as **‘Non-Statutory Safeguarding Enquiries’** (UK only).

Safeguarding Children and promoting the welfare of children is defined in the statutory guidance on multi-agency working³ as:

- Providing help and support to meet the needs of children as soon as problems emerge
- Protecting children from maltreatment, whether that is within or outside the home, including online
- Preventing impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Promoting the upbringing of children with their birth parents, or otherwise their family network, through a kinship care arrangement, whenever possible and where this is in the best interests of the children
- Taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework

In the statutory guidance for schools and colleges, Keeping Children Safe in Education⁴ (UK only), safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

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

Section 11 of the Children Act 2004⁵ (UK only) placed duties on a range of organisations and individuals to ensure their functions, and any services they contract out to others, are discharged regarding the need to safeguard and promote the welfare of children.

Abuse is the violation of a person's human, civil or legal rights by another person or persons. Abuse may be a single act, repeated acts and/or multiple acts. It may be physical, verbal, emotional or psychological. It may be perpetrated as a result of deliberate intent, negligence, or ignorance.

Abuse may be an Act of Omission (failing to act) or neglect. Abuse may involve the person at risk of abuse or neglect being persuaded or forced to enter into a financial or sexual arrangement to which they have not, or cannot, understand or consent.

³ [Working Together to Safeguarding Children 2023](#)

⁴ [Keeping Children Safe in Education 2023](#)

⁵ [Children Act 2004](#)

An abuser may be anyone who has contact with the person at risk of abuse or neglect. This may be a family member, carer, friend, professional staff, support staff, neighbour, volunteers, people in a position of trust, or another service user.

Harm is caused by any physical, sexual, or emotional abuse, neglect, accident or injury that is serious enough to adversely affect wellbeing, health and development. Harmful conduct may include:

- Behaviour that causes physical or psychological harm, such as harassment and intimidation, causing fear, alarm or distress
- Unlawful conduct which may affect property, rights or interests, for example, theft, fraud or extortion
- Behaviour that causes self-harm and self-neglect.

Harm is defined in the Children Act 1989 (UK only) as ill treatment or **the impairment of health or development of the child**. Harm can be determined 'significant' by comparing the child's health and development with that which would be expected of a similar child. In this regard, '**development**' means physical, intellectual, social, emotional or behavioural. '**Health**' means physical and or mental health.

Significant Harm is a concept introduced in the Children Act 1989 (UK only). It is the threshold for compulsory intervention in the best interests of children. It gives Local Authorities in England to make enquiries to decide whether they should take action to safeguard or promote the welfare of a child who is suffering or likely to suffer significant harm.

There are no absolute criteria upon which to rely when judging what constitutes significant harm; sometimes, a single traumatic event may constitute significant harm. More often, however, significant harm is a compilation of significant events, both acute and long-standing, that interrupt, change, or damage a child's physical and psychological development.

Ill Treatment includes sexual abuse and forms of treatment that are not physical, including, for example, impairment suffered from seeing or hearing the ill treatment of another.

5. The Rights of Individuals

People who work for or on behalf of Hult International Business School or engage with our programmes and services will be treated with respect concerning their privacy, dignity, and independence.

We recognise that an individual's right to an independent life may sometimes include exposure to risk. In all situations of identified risk, our staff will assess, manage, review, and minimise harmful situations.

Hult International Business School will take account of the ‘Six Key Principles’⁶ that underpin all adult safeguarding work, namely:

- **Empowerment:** people being supported and encouraged to make their own decisions and give informed consent.
- **Prevention:** It is better to act before harm occurs.
- **Proportionality:** The least intrusive response appropriate to the risk presented.
- **Protection:** Support and representation for those in greatest need.
- **Partnership:** Local solutions through services working with their communities. Communities have a part to play in preventing, detecting, and reporting harm, neglect and abuse.
- **Accountability:** Accountability and transparency in delivering safeguarding.

In addition, Hult International Business School will consider what children have said they want from an effective safeguarding system⁷, namely:

- **Vigilance:** to have adults notice when things are troubling them
- **Understanding and Action:** to understand what is happening; to be heard and understood; and to have that understanding acted upon
- **Stability:** to be able to develop an ongoing stable relationship of trust with those helping them
- **Respect:** to be treated with the expectation that they are competent rather than not
- **Information and Engagement:** to be informed about and involved in procedures, decisions, concerns, and plans
- **Explanation:** to be informed of the outcome of assessments and decisions, and the reasons when their views have not met with a positive response
- **Support:** to be provided with support in their own right, as well as a member of their family
- **Advocacy:** to be provided with advocacy to assist them in putting forward their views
- **Protection:** to be protected against all forms of abuse and discrimination, and the right to special protection and help if a refugee.

6. Safeguarding Governance: Roles and Responsibilities

Hult International Business School is committed to supporting all those involved with the organisation. A clear structure of safeguarding accountability helps everyone understand their individual and collective responsibilities for safeguarding people.

Hult International Business School will ensure that good governance and quality standards are maintained within the organisation and establish clear policies and procedures based on

⁶ <https://www.gov.uk/government/publications/care-act-statutory-guidance/care-and-support-statutory-guidance>

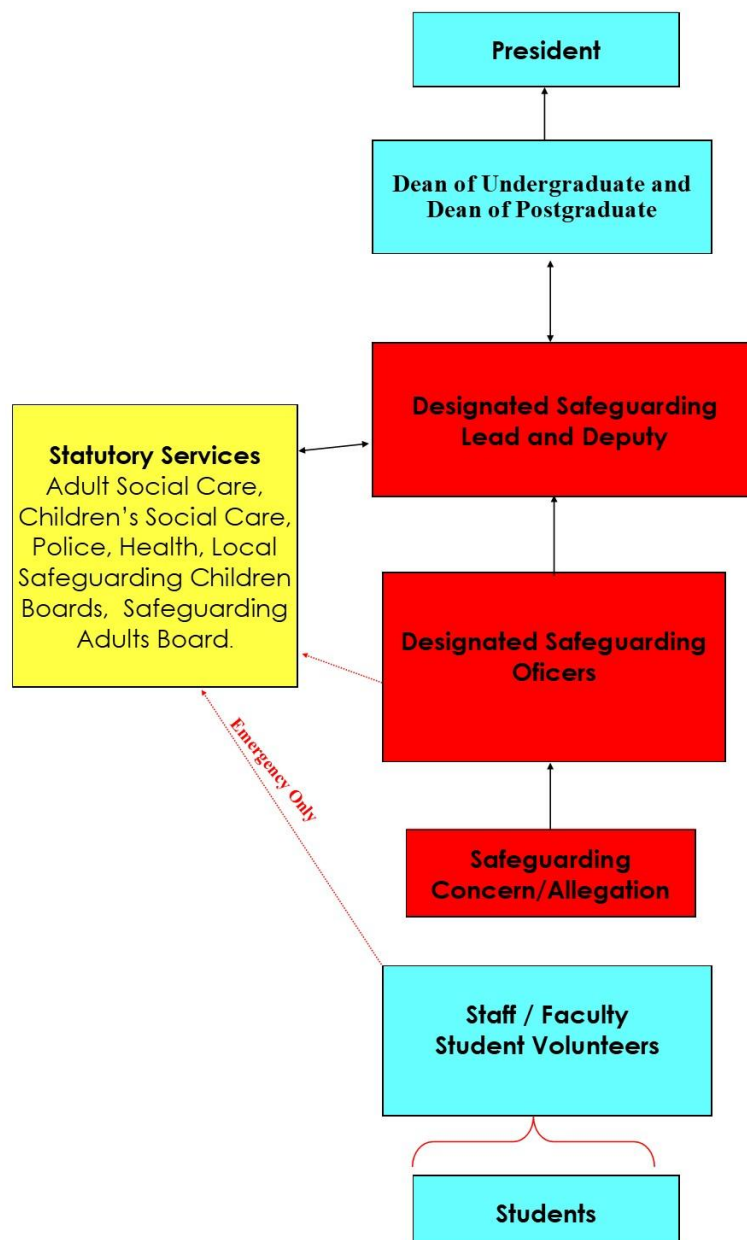
⁷ [Working Together to Safeguard Children 2023](#)

legislation and guidance. We will apply robust risk management processes to identify situations that may require the organisation to make professional judgements to protect children and/or adults from harm.

All trustees, staff, students, faculty, student volunteers, and those working for or delivering services on behalf of our organisation are responsible for reading and adhering to the Hult.

International Business School Safeguarding Procedures Handbook.

Figure 1: Hult International Business School's Reporting Pathway



6.1 President and Senior Management Team

The Senior Management Team will ensure that Hult's commitment to safeguarding is integral to delivering all its services, activities, events and contracts.

They will ensure that:

- Safeguarding and a culture of vigilance are promoted and embedded in all areas of the school
- Clear and effective communication pathways for safeguarding are shared with all staff, faculty and student volunteers
- There is an approved safeguarding training strategy
- The Designated Safeguarding Lead (and Deputy) and Designated Safeguarding Officers (DSOs) have sufficient resources in order that they may discharge their functions as detailed below

6.2 Designated Safeguarding Lead and Deputy

The Safeguarding Lead and Deputy will be provided with the appropriate level of training to enable them to fulfil their responsibilities in supporting and guiding staff on safeguarding matters.

They will:

- Provide ready and accessible support and guidance to all the Designated Safeguarding Officers (DSOs) on safeguarding matters
- Manage all safeguarding reports and act as liaison for statutory services during any criminal or safeguarding investigation
- Ensure that serious incidents relating to safeguarding are reported immediately and managed effectively
- Report allegations against staff, faculty members and student volunteers, students to to the Local Authority Designated Officer (DO) and Disclosure and Barring Service (DBS) (UK only). In the UAE, safeguarding concerns should be reported to the Ministry of Interior's Child Protection Centre or relevant emirate-level authorities (UAE only).
- Ensure accurate records of all safeguarding concerns and the secure storage of all safeguarding records

6.3 Designated Safeguarding Officers

The Designated Safeguarding Officers will be provided with the appropriate level of training to enable them to fulfil their responsibilities in supporting and guiding staff and student volunteers on safeguarding matters. They are responsible for responding to initial concerns or disclosures.

They will:

- Monitor and respond to all safeguarding concerns from staff, faculty, student volunteers and students.
- Ensure that all incidents are triaged to the Designated Safeguarding Lead and/or Deputy to ensure that they are concluded in a timely and effective manner (within 24 hours).
- Ensure that all safeguarding incidents are recorded to a high standard and in line with the agreed corporate process. For example, ensuring the safeguarding concern form is completed thoroughly including contemporaneous notes and body chart as appropriate.
- Ensuring that all safeguarding reports are kept securely and in line with data protection requirements.
- Liaising with statutory services on safeguarding matters where appropriate.

6.4 Staff, Faculty and Student Volunteers

All staff, faculty and student volunteers have a shared responsibility to safeguard and promote the wellbeing of children and adults. They will know how to recognise, respond to, report and record any safeguarding concerns.

All staff, faculty and student volunteers are responsible for following our safeguarding procedures, for reporting any concerns relating to harm, abuse or neglect or suspected harm, abuse or neglect of any child or adult immediately. It is essential that students will be encouraged to report any incident of abuse, harm or neglect.

In an emergency staff, faculty and student volunteers will be expected to report urgent concerns direct to the relevant statutory agency.

7. Preventing and Minimising Risk

Hult International Business School will strive to minimise risks by:

- The provision of up-to-date safeguarding policies and procedures that reflect current safeguarding legislation and guidance
- Operate in line with the Local Authority safeguarding policies and procedures
- Have fair and rigorous safer recruitment, selection, appointment and induction procedures for staff, faculty and student volunteers. Please refer to the Staff Handbook Appendices 9-10.
- Promote and use safer working practices for staff, students and faculty and student volunteers such as maintaining professional boundaries, following a code of conduct, procedures for welcoming students and up to date communications.
- The provision of induction and ongoing training for staff and student volunteers. For levels of training, frequency and delivery method please refer to the safeguarding procedures.

- Developing and maintaining a culture of vigilance within all areas of the organisation's work.
- Protecting people from harm
- Making sure people can raise safeguarding concerns and know how to access support
- Handling allegations or incidents or raise concerns in accordance with policies and procedures
- Ensuring whistleblowing policy and procedures are understood and in place
- Report any allegations or incidents to the relevant authorities

Staff, faculty and student volunteers will strive to minimise risks by:

- Working with each other, partner organisations and students in an empowering way that respects their autonomy and civil rights to self-determination.
- Understanding what constitutes vulnerability and abuse and what to do if they suspect abuse.
- Taking immediate action when recognising or suspecting signs of abuse.
- Discussing any support issues and concerns promptly with line managers and/or with an appropriate person.
- Questioning practices that may be harmful or abusive and taking further action e.g., reporting concerns, whistleblowing etc.
- Taking part in training and skills development.

8. Reporting Safeguarding Concerns or Disclosure

All staff, faculty, and student volunteers have a duty to raise concerns about a person who is experiencing or at risk of abuse or neglect, without prejudicing their positions. All have a duty under the Public Interest Disclosure Act 1998,⁸ (UK only) to report any suspicion or allegation of abuse, or if they have reason to believe someone is at risk of abuse.

Referrals of suspected abuse or allegations of abuse regarding an adult or child should be made in accordance with the [Hult International Business School Safeguarding Procedural Handbook](#).

9. Information Sharing

The Data Protection Act 2018 and the General Data Protection Regulations 2018 (GDPR) place greater significance on organisations being transparent and accountable in relation to their use of data. All organisations handling personal data must have comprehensive and proportionate arrangements for collecting, storing, and sharing information. (UK only). In the UAE, data protection is governed by Federal Decree-Law No. 45 of 2021 (UAE only).

⁸ [Public Interest Disclosure Act 1998](#)

Personal information held by Hult International Business School is subject to a legal duty of confidentiality and will not normally be disclosed without the consent of the individual. However, the right to confidentiality and respect for private and family life (Article 8, Human Rights Act, 1998) is not absolute.

The only exceptions to this are where confidentiality can be overridden either by a court order or other legal authority (e.g., Prevent Duty), or in the public interest, i.e., to safeguard a child or adult at risk.

Public interest justifications usually relate to disclosures to prevent significant or serious harm to third parties or to prevent and/or prosecute a serious crime. e.g. suicide pacts, terrorist threats, and an unsupervised young child.

Hult International Business School recognise that information sharing between key organisations is essential to safeguard children and adults at risk of abuse, harm, neglect and exploitation.

All staff, faculty, and student volunteers must consider the relevant data protection principles that allow them to share personal information. Concerns about sharing information cannot stand in the way of safeguarding and promoting the welfare of children and adults, especially those adults identified as being at risk of harm, abuse, or neglect.

Sharing the right information at the right time and with the right people is fundamental to good safeguarding practice. Please refer to the Data Protection Policy in the Staff Handbook, Appendix 4.

When safeguarding a child, consideration will also be given to the ***‘10 Step Guide to Sharing Information to Safeguard Children’***, published by the Information Commissioner’s Office.⁹

Information relevant to safeguarding will often be considered ‘special category personal data’, meaning it is sensitive and personal.

Where staff, faculty, and student volunteers need to share ‘special category personal data’, they should be aware that the Data Protection Act 2018 includes ‘safeguarding of children and individuals at risk’ as a condition that allows you to share information without consent. (UK only). In the UAE, data protection is governed by Federal Decree-Law No. 45 of 2021 (UAE only).

Information can be shared legally without consent if the person is unable to or cannot reasonably expect to gain consent from the individual or if gaining consent could place the child or individual at risk of harm.

⁹ [Information Commissioner's Office](#)

Relevant personal information can be shared lawfully if it is to keep a child or individual safe from neglect, physical, emotional, or mental harm, or to protect their physical, mental, or emotional wellbeing.

Hult International Business School will also refer to the relevant local Children Safeguarding Partnerships or Adult Safeguarding Boards' multi-agency information sharing agreements and protocols for further guidance.

For further information, see [here](#).

10. Consent and Mental Capacity (UK only)

Consent is a legally defined decision given by someone who is competent, who has been adequately informed (and has adequate understanding) and who is free from undue influence, enabling them to make a voluntary decision.

The person can provide consent themselves (provided they are competent). Otherwise, someone else who is empowered by law can provide it (e.g. a parent in the case of a child). A child who is incapable of giving consent alone can still be involved in the decision-making process with others who can, by law, to provide consent.

It is a fundamental principle of English law that adults have the right to make decisions on their own behalf and are assumed to have the capacity to do so. This is known as the '*presumption of capacity*' and extends to decisions that may entail personal risks and that may not be in accordance with an objective view of their best interests.

The Mental Capacity Act 2005¹⁰ (MCA) applies to everyone involved in the care, treatment and support of people aged 16 and over living in England and Wales who are unable to make all or some decisions for themselves.

Adults lacking capacity to make decisions that would protect and promote their own interests are potentially extremely vulnerable. In accordance with the principles of the Mental Capacity Act 2005, those aged 16 and over who lack capacity should be at liberty to participate as far as possible in decision-making and express their views, but emphasis should shift to ensuring that decisions made on the adult's behalf promote their overall best interests.

¹⁰ <https://www.legislation.gov.uk/ukpga/2005/9/contents>

Where the individual lacks capacity, information can be disclosed in accordance with the Mental Capacity Act 2005, where, in the opinion of the member of staff, it would be in the incapacitated person's best interests.

On the rare occasions that staff, faculty or student volunteers have to make a decision on behalf of an adult who is lacking capacity, they will do so in that person's best interest, using the common checklist of factors outlined in the Mental Capacity Act Code of Practice¹¹

Where an adult lacks capacity to consent to disclose it is usually reasonable to assume that they would want people close to them or directly involved in their care to be given appropriate information about their situation unless there is evidence to the contrary.

Further information is available in the [Hult International Business School Safeguarding Procedural Handbook](#).

11. Safer Recruitment and Selection

Hult International Business School is aware of its responsibility to ensure that it carries out appropriate, safer recruitment practices for all positions within the organisation. The Safeguarding Vulnerable Groups Act 2006, section¹² (UK law), requires the organisation to carry out specific vetting checks.

The recruitment and selection of all staff, faculty, and student volunteers will comply with current legislation and safeguarding guidance. This means that all new positions will clearly state in the vacancy advertisement and candidate information pack that the candidate must undergo all necessary and relevant pre-appointment vetting checks relevant to the role.

For further information, refer to the Hult International Business School [Safer Recruitment Policy and Procedures](#).

12. Safeguarding Training

We believe that training and raising awareness of safeguarding issues, policies and procedures is fundamental to the development and maintenance of a safer environment, safer organisation, and safer staff. We will ensure that appropriate safeguarding training is provided to all staff, faculty and student volunteers to assist them in:

- preventing abuse
- recognising abuse
- recording concerns

¹¹ <https://www.gov.uk/government/publications/mental-capacity-act-code-of-practice>

¹² <https://www.legislation.gov.uk/ukpga/2006/47/contents>

- responding appropriately to allegations of abuse
- knowing who to tell, and
- knowing when information can be shared.

Safeguarding training at the appropriate level to the role and responsibilities held will be a mandatory element of all inductions for staff, faculty and student volunteers. Furthermore, safeguarding training will not be regarded as a 'once only' activity, but as an ongoing development of skills and knowledge of safeguarding.

This means:

- Induction training for all staff and student volunteers – Basic Awareness Level 1 (Every 3 years unless there are updates in national legislation and guidance).
- Designated Safeguarding Team — Initial officer training combined with DSL Refresher (every two years unless there are updates in national legislation and guidance).

Monitoring the working practices of staff, faculty, and student volunteers will be undertaken not less than once per year through appropriate supervision mechanisms, such as appraisals, to ensure the requirements of this policy and supporting procedures are being met.

13. Safeguarding Allegations Against Staff, Faculty and Student Volunteers

Hult International Business School recognises its duty to report concerns or allegations against its staff, faculty, and student volunteers. Please refer to the Code of Conduct for Staff, Faculty, and Student Volunteers.

It is a matter of policy that any staff, faculty, or student volunteers against whom a safeguarding allegation is made will engage in an investigation. This will be the case even if the allegation is not linked to their role or activity with the Hult International Business School.

Such instances will be rare, and any decision to suspend will not be taken lightly. The decision will be made after discussions with the Lead Designated Safeguarding Officer and the Dean.

During any investigation of an allegation against staff, faculty and student volunteers suspended from the workplace, we recognise that we have a continuing duty of care. It will ensure a link person is nominated (not connected to the investigation and should be a senior member of staff from a different department) to provide support and guidance and be able to signpost those suspended to other external support networks. e.g. Employee Assistant Program (EAP), student wellbeing and counselling team, local trade union reps, G.P., Samaritans, etc.

Referrals:

In the UAE, safeguarding concerns should be reported to the Ministry of Interior's Child Protection Centre or relevant emirate-level authorities (UAE only).

In the UK, allegations or concerns and all safeguarding concerns or allegations about its staff or student volunteers immediately to the appropriate Local Authority Designated Officer (LADO) in the Social Care Safeguarding Team (adults or children). The DSL will be responsible for making initial enquiries to determine if the concern should be referred to the LADO (For more information, refer to Working Together to Safeguard Children; UK only).

Immediate action should be taken where an individual has behaved in a way that has harmed a child or committed a criminal offence, which suggests that they may pose a risk to children if allowed continued contact with children.

Disclosure and Barring Service requirements and Duty to Report

In the UAE, safeguarding concerns should be reported to the Ministry of Interior's Child Protection Centre or relevant emirate-level authorities. In the UK, concerns about unsafe practices by any of our staff, faculty, and student volunteers should be reported to the Disclosure and Barring Service (DBS).

If we dismiss a staff member, faculty member, or student volunteer at any time due to relevant conduct, risk of harm, or receiving a caution or conviction for a relevant offence (or the person has resigned or left that post in circumstances where they may have been removed), then the Designated Safeguarding Lead or Deputy will make a referral to the Disclosure and Barring Service.

Please refer to the Staff Handbook Appendix 6 – Grievance, Capability and Disciplinary Procedures.

14. Complaints

All complaints about the conduct or behaviour of staff, faculty, or student volunteers will be dealt with according to the [Hult International Business School Academic Regulations](#).

If a complaint is identified as a potential safeguarding concern, then the Safeguarding Procedures will be followed.

15. Monitoring and Quality Assurance

Hult International Business School is committed to excellence in providing all its services. We do this by actively monitoring and reviewing the safeguarding systems in place. We will use an

electronic recording system (spreadsheet /log) to capture all relevant Safeguarding data to evidence and monitor compliance in safeguarding. We will keep all personal data confidential and secure and process all such data according to the Data Protection Act 2018, GDPR 2018, and ICO Code of Practice 2021. (UK only). In the UAE, data protection is governed by Federal Decree-Law No. 45 of 2021 (UAE only).

The Designated Safeguarding Lead and Deputy will actively review safeguarding cases (quarterly) and safeguarding procedures (annually) to identify common themes or trends across our services that arise from all safeguarding concerns or disclosures.

This quality assurance mechanism is a crucial and integral part of the safeguarding governance arrangements. Best practices identified during any quality and review process will be fed into staff training and updated safeguarding procedures.

16. Linked Policies and Procedures

This safeguarding policy and the associated safeguarding procedures are linked to the following policies, procedures and documents and therefore should be read in conjunction:

- Code of Conduct for Staff, Faculty and Student Volunteers
- Complaints Policy
- Confidentiality and Data Protection Policy
- Disciplinary Procedures for Staff, Faculty and Student Volunteers
- Equal Opportunities Policy
- Health and Safety Policy
- Prevent Duty Policy
- Safer Recruitment and Selection
- Staff Code of Conduct
- Whistleblowing Policy