Safeguarding Policy

1. Introduction

1.1 International Business School (IBS) recognises and embraces its responsibility to protect and preserve the wellbeing and safety of all members of the IBS community to the highest possible standards. Providing a safe environment for all members is both a fundamental and essential requirement for all IBS activities.

1.2 In particular IBS recognises it has a specific duty of care for children, young persons and vulnerable adults who are involved in academic and non-academic on- or off-site activities organised by IBS as an institution.

2. Key Principles

2.1 The guiding intention of the IBS Safeguarding Policy is to provide those working with children, young persons or vulnerable adults with the framework and structure required for creating a safe, open, caring and nurturing environment suitable for diverse learning activities involving students of all ages. More explicitly, the key principles of this Policy are as follows:

- To define, support and promote safeguarding with clear and robust procedures and processes
- To maintain good practice around safeguarding with regular training activities
- To ensure that all staff (defined below) and students (defined below) are fully informed and understand how to report any concerns
- To ensure all relevant legislation is taken into account and followed at all times
- To ensure that any relevant concerns are shared with the appropriate internal staff as well as external agencies in a timely fashion

2.2 IBS believes that it has a social, moral and legal responsibility to protect and safeguard the welfare of children, young persons and vulnerable adults and, as such, this Policy is as pro-active and comprehensive as possible. IBS, on the other hand, also recognises its duty to raise the awareness of parents and legal guardians to the fact that the ultimate responsibility for the safety and welfare of their children rests with them.

3. Scope of the Policy

3.1 This Safeguarding Policy applies to:

- All current students
- All applicants engaged in activities organised by IBS
- All contracted staff in the course of their duties
- All individuals participating in activities organised by IBS as an institution

4. Policy Context and Other Relevant IBS Policies and Procedures

4.1 This Safeguarding Policy sits within a wider umbrella of IBS policies related to applicants, students, staff, and their safety. It directs all parties to the relevant policies and procedures below:

- Staff Contracts of Employment
- IBS Code of Ethics
- Principles and Practices of Wellbeing at IBS
- Equality, Diversity and Inclusion Policy
- Dignity and Respect Policy
- Policy to Prevent Radicalisation and Extremism

- Provisions for Disabled Students
- Student Disciplinary Regulations
- Regulations of Use of IT and Technical Equipment
- IBS General Data Protection Regulation (GDPR)
- Guidance for the Parents/Legal Guardians of Students Aged Under 18 on Entry
- Policy on the responsible use of electric devices, e-mail and social media

5. Legal Frameworks and Compliances

5.1 This Policy is devoted to the protection of human lives without compromising freedom, equality and diversity. Additionally, IBS recognises its legal responsibilities and as such, this Policy follows from, and is in line with, the values, spirit and principles as declared in the following policies and regulations:

- The Fundamental Law of Hungary
- Hungary's National Security Strategy
- The Criminal Code of Hungary (Act C of 2012)
- Act on National Higher Education (Act CCIV of 2011)
- The Child Protection Act (Act XXXI of 1997)
- European Convention on Human Rights
- EU Strategy for Combating Radicalisation and Recruitment to Terrorism

6. Definition of Safeguarding

6.1 IBS defines safeguarding as:[1]

a) Protecting children, young persons or vulnerable adults from maltreatment
b) Preventing impairment of children's, young persons' or vulnerable adults' health or development
c) Ensuring that children, young persons or vulnerable adults are growing up in circumstances consistent with the provision of safe and effective care
d) Taking action to enable all children, young persons or vulnerable adults to have the best outcomes of their experience at IBS

7. Other Definitions

7.1 IBS has the following definitions in support of this Policy:

Child or Young Person: a person under the age of 18

Vulnerable Adult: a person over the age of 18 who may be unable to take care of themselves or protect themselves against abuse, bullying, harassment, victimisation, extremism, peer pressure, significant harm or exploitation, typically (but not exclusively) due to health or disability issues

Safeguarding Panel

The Safeguarding Panel is the panel that meets or discusses relevant safeguarding cases, procedures and all related matters. It consists of:

- Designated Safeguarding Lead Officer
- Designated Safeguarding Training Officer
- Head of Centre of Student Services
- Head of Centre for Education and Research

[1] Adapted from *"Working Together to Safeguard Children" (2018)*

For further definitions please refer to Annex E. “Glossary of Terms”

8. Designated Safeguarding Officers and Scope of Responsibilities

8.1 Students

The Student Support Manager is IBS’ **Designated Safeguarding Lead Officer** (DSLO) for students. The DSLO is the first point of contact for all safeguarding concerns, monitoring and reviewing all related procedures and for keeping records of all referred cases, Safeguarding Panel meetings and their outcomes. The DSLO works collaboratively with the Chief HR Officer in terms of the institutional dissemination of information, training and liaising with third/external parties.

At board level, the Pro-Rector for Operations – in charge of student wellbeing and student administration – is responsible for issues related to safeguarding.

8.2 Staff

The Chief HR Officer is IBS’s **Designated Safeguarding Training Officer** (DSTO) for matters specifically related to staff and their training. The DSTO works with the DSLO in these matters.

9. How to Report a Concern

9.1 Specific safeguarding concerns should be raised and addressed via the ***Safeguarding Concern Procedure*** as detailed in **Annex A** below. This procedure is used for all formally expressed concerns for all children, young persons and vulnerable adults.

10. Onward Referral to External Parties

10.1 Onward referral to external parties will be made if it is justified and deemed necessary once a Safeguarding Concern has been made. The following agencies can and will be referred to if necessary:

- Emergency Services
- Social Services
- Family and Child Welfare Centre (Családi és Gyermekjóléi Szolgálat)
- Guardianship Authority (Gyámhivatal)
- Specialist Support Services
- Relevant Health Professionals

11. Risk Assessments

11.1 Risk assessments are built into IBS processes, procedures and activities in order to take full account of all those who are vulnerable or who may become vulnerable in the case of all activities where such persons are, or might be, involved (cf. Annex C).

Risk assessments are produced by the head or leader of the organisational unit organising and/or directly supervising the activity (see list of activities below) at least 7 days prior to the commencement of the activity. The forms must be submitted to, and are approved and stored by, the DSLO.

11.2 Activities

- On-campus activities
- Off campus activities organised by IBS (excursions, museum visits, thematic or sport club events etc.)
- Outward mobility – ensuring that students with known issues are able to access support and healthcare abroad
- Recruitment activities (educational fairs locally or abroad)

11.3 Places

- IBS campuses
- Sports facilities
- Off-campus activity venues

12. Recruitment, Screening and Staff Training

12.1 IBS is committed to recruiting all of its employees (teachers and staff) to the highest standards, employees who embrace IBS's values of diversity and inclusion as well as respect all legislative requirements (Contract of Employment and Code of Ethics). As part of this, IBS also adopts safer recruitment guidelines (**Annex B)** for all stages of its recruitment process in line with the requirements of the Act on National Higher Education (Act CCIV of 2011). All offers of employment to all posts are conditional on the individual presenting the appropriate certificates (typically the "Erkölcsi bizonyítvány", Hungarian equivalent of a DBS), which is recorded in the Employee's electronic records. Failure to do so will result in the withdrawal of the offer of employment. In line with the Act on National Higher Education (Act CCIV of 2011), the "Erkölcsi bizonyítvány" does not need to be presented if the employee presented it earlier for a prior contract with IBS, and the period between expiry of the previous contract and the new contract does not exceed 6 months. Whenever underage students or vulnerable adults are in the company of a person external to IBS (e.g. guest lecturer) on campus, then a staff member of teacher must be present.

12.2 Safeguarding training is mandatory for all IBS employees (tutors, staff) who are in contact with children or vulnerable adults. It is organised for all new staff by the DSTO alongside mandatory health and safety training in order to ensure that all those working with a child, young person or vulnerable adult are sensitised to be able to identify those at risk and to report appropriately safeguarding concerns that they may have. Refresher safeguarding training is organised to the above employees every three years. All employed staff must adhere to the Code of Ethics.

12.3 The DSLO and DSTO are responsible for informing all staff of the IBS Safeguarding Policy, the Safeguarding Concern Procedure and ensuring that teachers and staff are properly trained on how to spot signs of abuse and significant harm.

13. Monitoring, Evaluation and Review

13.1 The monitoring of cases is conducted by the Safeguarding Panel. Evaluation and review is also conducted by the DSLO. Recommendations to improve this Safeguarding Policy and its processes can be made by the Safeguarding Panel, the Rector, the Chief Executive Officer (CEO) or the IBS Operative Board at any point.

This Policy is subject to an annual review to ensure that IBS is up to date with all relevant legislation. The annual review is carried out by the Safeguarding Panel and approved by the Rector by 20 July every year. (cf. Annex D)

14. Data Protection

14.1 As an institution, IBS is subject to General Data Protection Regulations (GDPR) and as such adheres to this strictly, especially concerning the liaison with students, parents, legal guardians. The Data Protection Regulations of IBS are available here: https://www.ibs-b.hu/about-ibs/regulations

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This Policy was adopted by the Senate in virtue of the resolution No. 3/2022 at the session held on 16 May 2022.

Annex A

Safeguarding Concern Procedure

1. Introduction

It is imperative that children, young persons and vulnerable adults are protected from abuse. The guidelines laid out below must be followed whenever an allegation is made that a child, young person or vulnerable adult has been abused or when there is a suspicion that a child, young person or vulnerable adult has been or is at risk of abuse or significant harm

2. When a vulnerable adult is at risk

Any safeguarding concerns (namely that there is a risk or concerns of significant harm to a vulnerable adult) should be brought to the attention of the Designated Safeguarding Lead Officer (DSLO) at the earliest opportunity, preferably in writing, detailing as much evidence as possible. In these instances, the DSLO has three options.

1) Convene a Safeguarding Panel Meeting/Inform Safeguarding Panel Members in order to determine the next appropriate step(s).
2) Contact external agencies immediately. – ***Only the DSLO has the authority to do this prior to informing Safeguarding Panel Members if they deem the situation worthy of such action***
3) Take no further action

The DSLO must take the above action immediately but no later than within 72 hours of becoming aware of the concern.

If a Safeguarding Panel is convened, they must meet within three working days and decide how to proceed. The Safeguarding Panel has five options:

1) Require further investigation of the concern by the DSLO
2) If there is evidence that the risk originates from an IBS student, initiate “Fitness to Study” Procedures as laid down in Sections 3.2-3.5 of the Policies and Procedures of Student Support
3) If there is evidence that the risk originates from an IBS employee or an external contractor, notify the DSLO and initiate appropriate action detailed in Point 6 below.
4) Contact external agencies – this option can be used alongside the above options.
5) Take no further action

The DSLO will keep a record of what was discussed and what steps were agreed. Decisions to refer to external agencies are carried out by the DSLO.

Members of staff and students are not expected to liaise with external agencies.

3. When a child or young person is at risk

If a member of staff, student, external contractor or whomever else has any concerns about possible child abuse, or that a child or young person is in significant harm, they must inform the DSLO preferably in writing, detailing as much evidence as possible. All suspicions, allegations or incidents of abuse must be reported to the DSLO at the earliest opportunity.

Upon receipt of the concerns, unless a strong reason exists to doubt the credibility of the concern, the default action by the DSLO is to **contact the appropriate external agency as a matter of urgency.** These external agencies include:

- Emergency Services
- Social Services
- Family and Child Welfare Centre (Családi és Gyermekjóléi Szolgálat)
- Guardianship Authority (Gyámhivatal)
- Specialist Support Services
- Relevant Health Professionals

The DSLO must take the above action immediately but no later than within 72 hours of becoming aware of the concern.

The DLSO will be guided by the relevant external agency as to the next appropriate steps. The DSLO must make a written record in writing and subsequently convene a Safeguarding Panel Meeting and/or inform the panel.

The DSLO will keep a record of all outcomes.

Members of staff and students are not expected to liaise with external agencies.

4. Notifying Parents/Legal Guardians

When an external agency is involved, the DSLO should discuss with the relevant external agency what action should be taken in regards to informing the parents or legal guardians of the child or young person. It is not the expected responsibility of the DSLO to inform parents or legal guardians if this is part of the protocol of the external agency. When it is not part of the protocol of the external agency or if the external agency fails to inform parents or legal guardians then it becomes the responsibility of the DSLO to inform parents or legal guardians of any safeguarding concerns or investigations affecting their child.

The Safeguarding Panel will be informed of this at all times.

5. Allegations against a student

In cases where the allegation or apparent abuse of a vulnerable adult is by a student engaged in activities related to IBS, the DSLO will, without any assumptions determine the most appropriate steps and procedures to be taken depending on the particular circumstances, except in cases requiring the immediate involvement of external agencies. In these cases, the DSLO will be guided by the relevant external agency.

The DSLO will keep records of all outcomes.

6. Allegations against a member of staff or contractor

In the event that there is any suspicion, allegation or apparent abuse of a child, young person or vulnerable adult by a member of staff, the matter must be reported to the DSLO.

On being notified of any such matter, the DSLO shall:

- take immediate steps they consider necessary to ensure the safety of the child, young person or vulnerable adult
- liaise with the person who reported the original concern and ensure that a formal report is completed
- notify the DSTO, who must inform the Rector and initiate investigation of the case in line with the relevant procedures, the IBS Code of Ethics, the contract of employment and other relevant IBS regulations

The DSLO must take the above action immediately but no later than within 72 hours of becoming aware of the concern.

If the allegation is against the DSLO, they should not be involved in the above process

All staff should be aware of the fact that allegations may be against them, and that the allegation may or may not have grounds for substantiation. Investigations may result in the application of Disciplinary Procedures, or even in termination of contract. The Rector may order immediate suspension of the member of staff for the duration of the investigation as a precaution.

7. Feedback on outcome

The DSLO shall ensure that upon closure of the case, the alleged victim, parent/guardian if appropriate, and the person who raised the concern, receive appropriate feedback on the outcomes, in a discreet and tactful format, duly respecting privacy and data protection considerations in every case.

8. Confidentiality and language

The safety, wellbeing and confidentiality of the person(s) involved in allegations or concerns (alleged victims as well as alleged perpetrators of any acts raising concerns, or making or reporting the allegation or concern – staff, student or anyone else) should be maintained throughout the process in line with the IBS Data Protection Regulations and relevant laws. Where feasible, IBS should provide an opportunity for alleged victims to present their cases in their native language.

If the allegation involves a potential criminal act, IBS will contact the police. Transferring personal data to the police in the process of reporting such allegations is not a violation of data protection regulations (cf. Annex 3 of the Act on National Higher Education).

9. Responsibility

These Procedures determine the actions and deadlines that need to be performed and observed, respectively, by persons in various roles at IBS. Should any of these persons fail to perform their duties contained herein, leading to harm to children or vulnerable adults, or increased risk thereof, the Rector shall investigate the case and ensure that appropriate procedural or personal measures are taken.

Annex B

Safer Recruitment Guidelines

For IBS, ***Safer Recruitment*** means adopting safe practices in all stages to deter unsuitable candidates from applying or being appointed to any role in the organisation

Safer recruitment practices at IBS are adopted in all stages of recruitment planning and recruitment implementation. These guidelines are disseminated by the Chief HR Officer.

1. Job Descriptions

For all relevant positions, references to the responsibilities of safeguarding and the IBS Code of Ethics are made alongside IBS' institutional belief and commitment to safeguarding.

2. Job advertisements

All job advertisements for posts that involve responsibility for children or vulnerable adults make clear IBS's commitment to safeguarding.

3. Shortlisting

The shortlisting process will scrutinise all information made available on CV's and Motivation letters to discover any gaps or anomalies, which could be brought up at a potential interview.

4. Interview

Interviews, wherever deemed appropriate, include questions about safeguarding and working with children, young persons or vulnerable adults.

5. Checks (Internal and External)

Before an offer of employment is made by IBS, the relevant background checks are made, confirming applicants' identity, employment history, qualifications and any criminal convictions. Where necessary, independent references will be obtained. Relevant documents are sought and cross-checked (identity papers, degree and training certificates, prior employment proofs, reference letters, DBS-equivalent "Erkölcsi Bizonyítvány", etc).

6. Induction/Onboarding

Training for new employees includes a briefing on safeguarding, highlighting the Safeguarding Concern Procedure, alongside general health and safety training.

Annex C

Risk assessment form

Assessment carried out by:

Assessment date:

Assessment seen / approved by:

Approval date:

Type of risk	**Likelihood (please circle)** **1 = unlikely; 5 = highly likely**	**Risk management strategies (if 3 or higher)**
Situational hazards		
Attack by animal	1 - 2 - 3 - 4 - 5	
Drowning	1 - 2 - 3 - 4 - 5	
Entanglement in machinery	1 - 2 - 3 - 4 - 5	
Falling from height	1 - 2 - 3 - 4 - 5	
Impact / collision	1 - 2 - 3 - 4 - 5	
Object falling, moving or flying	1 - 2 - 3 - 4 - 5	
Sharp object / material	1 - 2 - 3 - 4 - 5	
Slippery surface / trip hazard	1 - 2 - 3 - 4 - 5	
Physical / chemical hazards		
Cold exposure / cold surface	1 - 2 - 3 - 4 - 5	
Heat exposure / hot surface	1 - 2 - 3 - 4 - 5	
Electric shock	1 - 2 - 3 - 4 - 5	
Fire	1 - 2 - 3 - 4 - 5	
Hazardous substance	1 - 2 - 3 - 4 - 5	
Radiation	1 - 2 - 3 - 4 - 5	
Noise / vibration	1 - 2 - 3 - 4 - 5	
Health hazards		
Disease / infection	1 - 2 - 3 - 4 - 5	
Allergic reaction	1 - 2 - 3 - 4 - 5	
Stress / anxiety	1 - 2 - 3 - 4 - 5	
Fatigue / exertion	1 - 2 - 3 - 4 - 5	
Lack of food / water / medicine	1 - 2 - 3 - 4 - 5	
Environmental pollution	1 - 2 - 3 - 4 - 5	
Security hazards		
Abuse / threats	1 - 2 - 3 - 4 - 5	
Harassment (physical or online)	1 - 2 - 3 - 4 - 5	
Peer pressure to undesired action	1 - 2 - 3 - 4 - 5	
Bomb threat / explosion	1 - 2 - 3 - 4 - 5	
Kidnap	1 - 2 - 3 - 4 - 5	
Assault	1 - 2 - 3 - 4 - 5	
Torture	1 - 2 - 3 - 4 - 5	
Radicalisation / extremism	1 - 2 - 3 - 4 - 5	

Annex D

Annual review of the IBS Safeguarding Policy - Form

Document Control Box	
Policy / Procedure Title:	IBS Safeguarding Policy
Approved By:	IBS Senate
Approval Date:	16 May 2022
Review Date:	15 July 2026
Previous Review Dates:	16 May 2022, 18 July 2023, 16 July 2024, 15 July 2025
Next Review Date:	15 July 2027
Related Policies, etc.	E-Policy, Principles and Practices of Wellbeing at IBS, Dignity and Respect Policy, Complaints Procedures, Code of Ethics
Policy Owner:	IBS Wellbeing
Lead Contact:	Kenneth Umeh

Annex E: Glossary of Terms

Abuse

Abuse can take many forms and includes:

- Physical abuse
- Sexual abuse
- Emotional/psychological (including online) abuse including cyber-bullying
- Financial/Material abuse
- Neglect/acts of omission
- Discrimination
- Domestic Abuse
- Modern slavery
- Radicalisation

Bullying/Cyberbullying

Bullying (and cyberbullying) is defined as any written, verbal or physical act, or any electronic communication, directed toward a person that is intended to cause or that a reasonable person would know is likely to cause, and that actually causes, physical harm or substantial emotional distress and may thereby adversely affect the ability of another person to participate in or benefit from the IBS' educational programmes or activities**.** Bullying can be carried out and received both individually and collectively.

Discrimination

Direct discrimination is where a person or persons are treated less favourably (intentionally or unintentionally) on the grounds of one of their characteristics including and not limited to age, disability gender reassignment, ethnicity, sex, sexual orientation, religious belief etc. Indirect discrimination is when policies or practices have an adverse impact on certain groups of people more than on others, in a way that cannot be justified. Discrimination can be carried out and received both individually, collectively and by the institution itself.

Extremism

Extremism is active behaviour whereby people who not only hold extremist[2] views actively target those who are vulnerable, including the young, by seeking to sow division between communities, and persuade others that groups of people belonging to a different gender/race/culture/religion/ethnicity are inferior.

Harassment

Harassment constitutes any behaviour that is unwelcome, unwanted and which may create the effect (intentional or unintentional) of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment which interferes with an individual's learning, working or social environment or induces stress, anxiety, fear or sickness on the part of the harassed person. Harassment can be carried out and received both individually and collectively.

Peer Pressure and Peer Influence

Peer Pressure is the persuading, encouraging, or imploring of another person (or group) of the same age (peer group) to engage in certain types of behaviour or the preventing of doing something else, whether an individual wants to do it or not. This can pressure be direct, indirect, spoken or unspoken, negative and positive. Peer Pressure can be carried out and received both individually and collectively. Peer influence is the changing of ones' behaviour to meet the perceived expectations of others in order to be accepted or fit in.

Radicalisation

Radicalisation is understood as "a process of developing extremist ideologies and beliefs"

[2] As defined in *"Policy to Prevent Radicalisation and Extremism: Code of Practice to Support Students and Staff"*

Significant Harm

Significant harm refers to the threshold that both justifies referral to the appropriate external agency/body and to the level of concern for a member of staff to flag an internal matter of concern. The relevant factors in deciding whether harm is significant include the severity of ill-treatment, the degree and extent of harm or danger and the duration and frequency of abuse and/or neglect.

Victimisation

Victimisation is defined as treating a person less favourably than another on grounds including and not limited to age, disability gender reassignment, ethnicity, sex, sexual orientation, religious belief etc. or because they have complained about discrimination or harassment or helped a person to do so. Victimisation may take place face to face, by writing or in written or electronic communications. Victimisation can be carried out and received both individually, collectively and by the institution itself.